

HOUSING ASBESTOS REVIEW – ACTION PLAN (v4) updated Sept 2019

Deadline for action:	
IMMEDIATE	Situation requires immediate attention to improve
INTERMEDIATE	Situation requires remedial work to improve
NOT URGENT	Procedures in place or underway shortly, working well and require an annual review

Immediate Action

Ref	Recommendations from H and S investigation	Response / actions agreed by H and LS.	Timescale
H1	It is imperative that a training matrix is established and data extracted from the HR system (Vision) to ensure appropriate training is delivered as required.	<p>Create Safety Manager Role – to oversee safety and manage Construction Health and Safety Co-ordinators (CHSC) and technical Business support.</p> <p>Will create technical support role (to work under Safety Manager – see later)</p> <p>Historical Health and Safety (H and S) training spreadsheet Interim – Business Support to collate and update, starting with asbestos, and hand over to new role.</p>	<p>COMPLETED</p> <p>Now in post and to create a team</p> <p>Training log for asbestos – in place</p>
H2	In relation to the specific subject matter asbestos, that nominated competent persons receive ‘Train the Trainer’ training in order to deliver differentiated in-house training as required.	<p>Review training content, and legal requirements. Tailor to work group requirements. Some can be shortened. (use of online for wider staff)</p> <p>Check up to date with train the trainer training.</p>	<p>COMPLETED</p> <p>UKATA certified training packages with practical at the end. Training has started feedback is positive CHSC now attended PTTLS</p>
H3	It is a requirement that competent persons are able to also ensure their training is kept current and in line with changes in legislation. In light of this competent persons should be released to attend relevant IOSH (Institute of Occupational Safety and Health) briefings in work time.	<p>Yes</p> <p>CHSC to find out when / where briefings are and to attend, and use info to update training</p>	<p>COMPLETED</p> <p>CHSC’s now attending regular IOSH meetings.</p>

H4	Regular briefings should take place in the form of either email or other communications to managers to inform them of exposures and remind them of the need to update the training matrix.	<p>Use existing process in place following exposure</p> <p>Lessons learned part of investigation reports – with actions and responsibilities</p> <p>Feedback into training</p> <p>Communication to teams and managers</p> <p>Safety Manager to ensure consistency of approach to reports, take on management of CHSC and processes.</p> <p>Report exposure incidents to safety meetings.</p>	<p>COMPLETED</p> <p>Safety Managers meetings in place and reviews of incidents takes place.</p> <p>CHSC is using messaging service such as Rapide when incident occur for operatives and managers,</p> <p>it is a further recommendation that monthly safety bulletins are sent out from the safety team including lessoned learned.</p>
H5	A formal Management Safety meeting is put in place to discuss issues including but not limited to Asbestos.	<p>Quarterly Safety Management Board meetings to be set up.</p> <p>Board members: Heads of Planned Programmes and Response Repairs, Safety Manager when recruited, Team Managers / CHCS / Policy and Project Officer Technical report to board as and when required,</p>	<p>COMPLETED</p> <p>Meetings started Sept 2018.</p>
H6	Immediate clarity of roles and responsibilities to ensure that systems are maintained, consistent and available.	<p>Briefing note / instructions - Clarity on roles and responsibilities – access to data, and keeping / updating data (aligned to new contractor arrangements).</p> <p>Surveys and removals.</p>	<p>COMPLETED</p> <p>Asset management to update data as this has to be standardised. Integration of the information with the asbestos contract with CASA now in place.</p>
H7	Complete procurement process for Corporate Contract as a matter of urgency.	<p>Due to go out to tender by mid October and mid November</p> <p>Subject to checks across teams involved.</p> <p>Head of Planned Maintenance is lead sponsor.</p>	<p>COMPLETED</p> <p>Surveying and asbestos removal frameworks now in place by Housing Services.</p>

H8	A process implemented to ensure that when an ICT system fails that there is directorate wide communication with updates on reinstating.	AMT to update staff where Keystone Asbestos data not available (New ICT system support to be in place post Civica go live).	COMPLETED Process in place using Rapide.
H9	Review approach to first on site to relet works – PPE and RPE.	Review Risk Assessment and PPE / RPE provision for relets, and clarity on circumstances (dynamic risk assessment) (DL)	COMPLETED DL reviewed risk assessments, Dynamic RA to be carried out by surveyors and Electricians they are now first on site.
H10	Add reminder to check sheets to warn about hazards such as asbestos and actions to take	Part of above work – will add to check list to read asbestos survey.	COMPLETED Asbestos has been added to the surveying sheet, first on site now Electricians.
H11	Inform managers and supervisors of the need for clear and consistent reporting of all safety breaches.	Actioned - general instruction issued to trade managers July 2018 Part of safety managers meetings.	COMPLETED Planned and major projects follow and use the system set up by response. Managers to report all incidents, reviewed in safety meetings.
H12	Inform managers that H and S breaches are subject to the Council's existing HR policies and procedures on investigations and disciplinary action.	Agreed. Any disciplinary action as appropriate following investigation and in line with HR policies	COMPLETED Process will be standardised so breaches following training with zero tolerance and in accordance with HR Policies.
H13	Label identified Asbestos to ensure third parties understand risk and improve reporting of damage.	Review how tenants are informed of survey results, and check the legal advice / best practice elsewhere. Review approach to labelling – already approach in AMP. Piece of work for new Safety Team.	Work in Progress Process and approach needs review by the new safety team – timescale July 2020.

		New tenants to get asbestos survey information (including mutual exchanges).	Currently asbestos identified and checked as part of FRA process.
		Methods of reporting / checks / already part of Fire Risk Assessments to check condition.	New Tenants get asbestos report / advice.

Intermediate Action

Ref	Recommendations from H and S investigation	Response / actions agreed by H and LS.	Timescale
M1	It is recommended that Housing Delivery employ a small team, to monitor health and safety training and monitor compliance and whose focus is health and safety compliance. This would involve auditing safety practice and raising issues with senior managers without delay with support from Corporate Safety Advisors.	Agreed – see above re safety manager and team.	COMPLETED Manager in place, and two CHSC will report to him. Safety team will be in place July 2019 – March 2020. Work has started on compliance discovery across housing teams and on shaping new team requirements – new Team Manager role in place.
M2	Training sessions should be smaller in size and broken down into sessions to ensure staff do not 'tune out'.	See above – will be tailored to workgroup requirements. Feedback on training was very positive and monitored. One issue dealt with and improvement evidenced.	COMPLETED Training content has been reviewed, started April 2019. Feedback is positive.
M3	Staff allocated to training should not be withdrawn from training under any but the most exceptional of circumstances	Agreed – attendance is mandatory and monitored.	COMPLETED Operatives booked by managers and operatives to sign In at the training session and records kept.
M4	Where an incident of exposure is the result of probable negligence, this should be recorded in order to quality control contractors and	We will ensure contractor breaches are reported to corporate H and S team to monitor for citywide view,	COMPLETED Arrangements in place. Will be supported and

	ensure other managers are able make informed decisions. Again this needs to be open access for all managers	where identified as part of investigations. All investigation reports sent to H and S team. Landlord services H and S accident and incidents report log in available on G Drive.	monitored by new safety manager and team June 2019, and with Corporate H and S team.
M5	Investigate the use of iPads or other tablets to ensure speed of information exchange	This has long been a part of the ITE project (since 2014), and still not got corporate tablet solution. Awaiting further trials again.	Work in progress. Training has shown a lot of issues could be removed if operatives were given direct access to Keystone Testing of new models at present. Target July 2020
M6	Ensure call handlers have tailored asbestos awareness training when tasked with accessing Keystone	See above tailored training, and roles	COMPLETED Schedulers included in the training plan CSC/ECO also due to have tailored training specific to their roles, the way response works at the moment
M7	Retrain first on site operatives in tailored asbestos awareness	Will be a priority for refresher training	COMPLETED Started April 2019 with Tersus
M8	Push for resources to allow for increased site visits and compliance checks	Gas and electric safety quality control checks in place, CHSC site visits in place to check CDM, PPE, CSCS cards, site diaries and check sheets. Review frequency and record keeping.	COMPLETED Will be supported by new safety team – July-Mar 2019
M9	Ensure panels are clearly marked on a survey diagram to avoid errors	To be part of new tender documentation	COMPLETED Part of new contract specifications
M10	Ensure tenancy books are updated with Asbestos	See above – new tenant information	COMPLETED

	information		In place See H13
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Not Urgent Action

L1	Time should be given on a weekly basis for the Competent Persons to meet and co-ordinate safety issues.	Part of new team arrangements and responsibilities	Work in progress as part of new team creation July 2019 – Mar 2020 New Safety Team arrangements
L2	Content of training should be reviewed to ensure compliance with legislation.	Training to be tailored to be more role specific, and in line with legislation. See above.	COMPLETED Jan / Feb 2019
L3	In line with corporate arrangement and statutory legislation, contractors will need to attend BCC briefings before working on our properties. This will need to be documented and available to commissioning managers.	Review specifications and terms All contractors to receive briefings Currently is done in contract start meetings, and site safety inductions, PCI.	Work in Progress All contractors are briefed now on asbestos risks relevant to contract. A new set of briefing slides being developed to enable a contractor sign off process – due by December 2019
L4	Discuss the timeframes allocated to re letting in relation to “is this reasonable and does it affect the safety of operatives?”	Will review process around the second survey needs, review approach to incidents where asbestos contract removals are found to be false. With involvement H and S team in reporting to HSE / licensing bodies. We agree safety comes first, and letting times have increased to accommodate surveys and removals for safe site working.	COMPLETED Noted and process in place
L5	Review monitoring of communal areas possibly in partnership with caretakers.	See earlier – done as part of FRA already. New reporting process in place with caretakers	COMPLETED

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