



# **Asbestos Management Policy**



## 1. Introduction

- 1.1. The Housing Plus Group ["HPG"] is a leading provider of quality, affordable homes and care services that customers can trust. With homes across Shropshire, Staffordshire and Telford & Wrekin, we believe everyone deserves a safe, comfortable and affordable place to live.
- 1.2. HPG is committed to maintaining safe and secure environments across all residential, office, and commercial properties. This Asbestos Management Policy outlines our approach to safeguarding health, ensuring effective asbestos management, and fulfilling our legal responsibilities as a landlord, care provider, and employer.

## 2. Policy Statement

- 2.1. HPG acknowledges its statutory responsibilities under the Health and Safety at Work etc. Act 1974 and the Control of Asbestos Regulations 2012 ["CAR 2012"], including compliance with the associated Approved Code of Practice L143: Managing and Working with Asbestos. In accordance with CAR 2012, Part 2, Regulation 4, HPG is designated as the Duty Holder for the management of asbestos in non-domestic premises and is legally obligated to implement effective controls to prevent exposure risks.
- 2.2. HPG will:
  - 2.2.1. Ensure that a suitable and sufficient assessment is undertaken to determine whether asbestos is present, or likely to be present, in non-domestic premises constructed before 2000, through the completion of asbestos management surveys.
  - 2.2.2. Ensure that asbestos management surveys for non-domestic premises are reviewed and, where necessary, updated at intervals not exceeding 12 months. Reinspection will also be undertaken if there is reason to believe that the existing assessment is no longer valid, or where significant changes to the premises may have altered the risk profile.
  - 2.2.3. Establish and maintain an Asbestos Register and an Asbestos Management Plan to assess and manage the risks associated with the presence of asbestos-containing materials ["ACMs"] in its premises. These tools will be used to determine the level of risk posed and to ensure that asbestos is managed safely and in compliance with legal requirements.

HPG will ensure effective management of asbestos by:

- The condition of ACMs, or materials suspected of containing asbestos, is regularly monitored.
- Any identified ACMs are properly maintained, or where necessary, safely removed by competent professionals; and
- Accurate and up-to-date information on the location and condition of ACMs is communicated to all individuals who may be at risk of disturbing them and made readily available to the emergency services.

2.2.4. Regularly review and update its Asbestos Management Plan to ensure it remains valid and accurately reflects the condition and extent of asbestos-containing materials across its non-domestic property portfolio. This process will ensure that the plan continues to be relevant, effective, and aligned with any changes in the premises or regulatory requirements.

2.2.5. Maintain accurate records for each building within its property portfolio, including all actions identified through asbestos management surveys. Where necessary, appropriate timescales will be set and action plans developed to ensure timely completion of required works.

2.2.6. Mitigate identified risks associated with ACMs, HPG will implement a structured programme of asbestos removal and remedial works. Prior to undertaking any responsive, void, or planned maintenance activities that may involve work on or near ACMs, relevant asbestos survey information will be provided to all personnel involved.

2.2.7. Where non-licensed ACMs (e.g., asbestos floor tiles or textured coatings) are identified and require removal, Housing Plus Group may use competent in-house operatives provided they meet the training, supervision, and competency standards required under Regulation 10 of CAR 2012. The use of Licensed Asbestos Removal Contractors [“LARCs”] will be retained for all notifiable non-licensed and licensed work, or where there is any uncertainty regarding the classification or risk level.

2.2.8. Ensure that any asbestos likely to pose a risk is identified before works commence and is managed appropriately. Where intrusive works are planned, a Refurbishment and Demolition [“R&D”] Survey will be carried out in accordance with regulatory requirements.

2.2.9. Ensure all staff, contractors, and consultants engaged in asbestos-related activities will be required to demonstrate competence in their roles. HPG will ensure that these individuals cooperate effectively as part of the overall asbestos management strategy. The procurement and appointment of contractors, consultants, and Direct Labour Organisations

["DLOs"] will include competency and performance assessments as part of a quality-based evaluation process. This evaluation will be weighted to ensure best value, which will be monitored throughout service delivery using Key Performance Indicators ["KPIs"].

2.2.10. HPG will provide asbestos awareness training to all staff who may encounter ACMs in the course of their duties. This training will be delivered upon joining the organisation and refreshed every two years.

2.2.11. A process of continuous improvement, independent assurance, and scrutiny will be embedded within HPG's asbestos management approach. This will be achieved through regular internal and external audits, with actions and recommendations from these audits implemented to strengthen compliance and safety.

2.3. In order to ensure compliance with the requirement of the legislation and this policy, performance reporting will be provided to the Executive Management Team ["EMT"] and the Audit and Assurance Committee as detailed within section 15 of this policy.

2.4. While there is no legal duty to manage asbestos within domestic premises under the Control of Asbestos Regulations ["CAR"] 2012, HPG recognises the potential presence of ACMs within its domestic housing stock. As part of its commitment to health and safety, HPG has previously undertaken asbestos management surveys across its domestic properties and will continue to do so for any newly acquired homes constructed prior to the year 2000.

2.4.1. HPG will undertake management survey re-inspections for domestic properties under the following circumstances:

- Where there is reason to believe that an existing survey is no longer valid;
- Where significant changes have occurred to the premises;
- Where the current survey is more than five years old and planned refurbishment works—such as kitchen or bathroom upgrades, rewiring, heating system replacements, or roofing works—are scheduled.

2.5. The Group is reviewing and determining the organisation's position on achieving 100% asbestos data coverage across all domestic properties. This includes evaluating operational feasibility, cost implications, and risk. Any change to the current approach will be subject to formal approval by the Board and recorded within the Asbestos Management Plan and associated strategic documents.

- 2.6. During construction projects governed by the CDM Regulations 2015, where a Principal Contractor is appointed, HPG will share responsibility for asbestos management. As the client, HPG will provide all existing asbestos information and arrange any necessary refurbishment surveys or removal works to support the needs of the Principal Contractor and Principal Designer.
- 2.7. HPG acknowledges that failure to comply with the CAR 2012 and the associated Approved Code of Practice L143 may result in enforcement action by the Health and Safety Executive ["HSE"]. This could include prosecution under the Health and Safety at Work etc. Act 1974, and in the most serious cases, under the Corporate Manslaughter and Corporate Homicide Act 2007. Non-compliance may also lead to a finding of serious detriment by the Regulator of Social Housing ["RSH"], with potential implications for regulatory grading and governance.

### 3. Policy Scope

- 3.1. This policy applies to all staff, tenants, service users, visitors, contractors, third-party providers, and any other individuals who may be affected by the actions or omissions of HPG in relation to asbestos management.
- 3.2. This policy applies to all domestic and non-domestic premises, or parts thereof, that fall within the scope of the CAR 2012 and are owned or managed by HPG.
- 3.3. HPG is committed to full compliance with the RSH's regulatory framework, including the consumer standards applicable to social housing in England. This policy supports the delivery of the Home Standard, which requires registered providers to ensure tenants live in safe, well-maintained homes and that all health and safety obligations are met.

### 4. Definitions

- 4.1. **Competent/Competency:** Refers to individuals who possess the necessary training, skills, knowledge, and experience to perform the role, task, or responsibility assigned to them. Specific competency requirements are outlined in the Asbestos Management Plan.
- 4.2. **Non-Domestic Premises:** Includes all commercial locations, workplaces, public buildings, residential buildings with communal or common areas (e.g. blocks of flats), Houses in Multiple Occupation (HMOs), and care homes.
- 4.3. **Domestic Premises:** A self-contained dwelling (e.g. house, bungalow, or flat) occupied by a single household or family unit, with no shared communal areas.

- 4.4. **Management Survey (Re-inspection):** A standard assessment of asbestos-containing materials (ACMs) conducted during normal occupation and use of premises. It identifies ACMs that could be disturbed during routine activities, maintenance, or installation of new equipment. The survey involves minor intrusion and disturbance to assess the potential for fibre release.
- 4.5. **Asbestos Register:** A document or digital record containing the results of asbestos surveys, including the location, quantity, and condition of identified or presumed ACMs. It forms a core component of the Asbestos Management Plan.
- 4.6. **Asbestos Management Plan:** A document outlining how identified or presumed asbestos will be managed following a survey. It includes the identity of the Duty Holder, the Asbestos Register, action plans, training schedules, communication strategies, contingency measures, and emergency procedures.
- 4.7. **Premises Constructed Prior to 2000:** Any building constructed before the year 2000 should be presumed to contain ACMs and must be subject to an asbestos management survey. The use of ACMs was banned in the UK in 1999; therefore, buildings constructed from 2000 onwards are not expected to contain asbestos.
- 4.8. **P1 Action:** Refers to remedial actions identified through asbestos management surveys, categorised by risk level (low, medium, or high) and requiring prioritised attention.

## 5. Roles and Responsibilities

- 5.1. **Board and Audit Committee:** Provide strategic oversight, ensure robust assurance frameworks are in place, and monitor key compliance risks associated with asbestos management.
- 5.2. **Chief Executive and Executive Team:** Lead the organisation's compliance culture by securing necessary resources, setting expectations, and championing performance standards.
- 5.3. **Executive Director of [Insert Directorate]:** Acts as the senior sponsor and executive lead for this policy, ensuring strategic alignment with broader asset and compliance frameworks. Designated as the Health and Safety Lead in accordance with the Social Housing (Regulation) Act 2023.
- 5.4. **Executive Director of Care and Support:** Designated responsibility for compliance with Care Quality Commission ["CQC"] regulations, including accountability for any prosecutions arising from failures to provide care and treatment in a safe manner. This includes incidents related to asbestos safety within regulated care settings.

- 5.5. **Director of [Insert Service Area]:** Responsible for operational oversight, performance management, and leadership of compliance and associated teams to ensure policy delivery.
- 5.6. **Head of [Insert Department]:** Holds tactical responsibility for programme implementation, quality assurance, and day-to-day operational management of relevant teams.
- 5.7. **[INSERT MANAGEMENT LEVEL ROLE]:** Leads the operational delivery of this policy, ensuring that inspection and servicing programmes are effectively managed, data integrity is maintained, and contractor performance is monitored.
- 5.8. **Asset Management and Repairs Teams:** Coordinate inspection schedules, manage contractor relationships, and ensure timely response to remedial actions and safety concerns.
- 5.9. **All Staff and Contractors:** Expected to report defects, adhere to established procedures, and actively participate in relevant training, audits, and safety initiatives.
- 5.10. **Governance Team:** Ensures accurate designation and compliance of statutory Health and Safety Lead roles in accordance with regulatory requirements and internal governance structures.

## 6. Ownership, Review, and Approval

- 6.1 **Policy Owner:** Director of [Insert Relevant Directorate] – accountable for the implementation, oversight, and periodic review of this policy.
- 6.2 **Review Frequency:** This policy will be reviewed at a minimum every three years, or sooner if there are significant changes in legislation, regulation, or organisational structure that impact its content or application.
- 6.3 **Approval Route:** The policy will be reviewed and endorsed by the Executive Management Team and formally approved by the Audit and Assurance Committee.

## 7. Applicable Legislation and Guidance

- 7.1. This policy ensures compliance with the Regulatory Framework for Social Housing in England, including the Consumer Standards introduced by the Regulator of Social Housing from 1 April 2024. These include the Safety and Quality Standard, Transparency, Influence and Accountability Standard, Neighbourhood and Community Standard, and Tenancy Standard. It also aligns with the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014.

7.2. The principal legislation underpinning this policy is the Control of Asbestos Regulations (CAR) 2012, which came into force on 6 April 2012.

7.3. The principal Approved Codes of Practice [“ACoPs”] and guidance documents applicable to this policy are:

- **L143: Managing and Working with Asbestos (Second Edition, 2013):** The primary ACoP consolidating previous codes (L127 and earlier L143) into a single document covering all work with asbestos
- **HSG264 – Asbestos: The Survey Guide (Second Edition, 2012):** Provides detailed guidance on conducting asbestos surveys. While not an ACoP, it is widely recognised as best practice.
- **HSG248 – Asbestos: The Analysts’ Guide (Updated Second Edition, 2021):** Replaces the 2006 edition and provides guidance for analysts involved in sampling, analysis, and clearance procedures.
- **HSG247 – Asbestos: The Licensed Contractors’ Guide (2006):** Guidance for licensed contractors undertaking asbestos removal and related work.
- **HSG227 – A Comprehensive Guide to Managing Asbestos in Premises (2002):** Offers practical advice for duty holders, though some content may now be superseded by L143 and HSG264.
- **HSG210 – Asbestos Essentials (Third Edition, 2012):** A task manual for building, maintenance, and allied trades involved in non-licensed asbestos work.

7.4. In addition to the Control of Asbestos Regulations 2012, this policy operates within the context of the following legislation:

- Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Personal Protective Equipment at Work Regulations 1992
- Hazardous Waste (England and Wales) Regulations 2005 (as amended 2009)
- Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended)
- Construction (Design and Management) Regulations 2015
- Defective Premises Act 1972
- Landlord and Tenant Act 1985
- Data Protection Act 2018
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013

## 8. Policy Delivery Programme



- 8.1. HPG will carry out asbestos management surveys and re-inspections in accordance with the CAR 2012, ensuring compliance with statutory duties and industry best practice.
- 8.2. In schemes identified as higher risk—due to property archetype, condition, or service demand—HPG may apply a reduced inspection cycle or implement enhanced monitoring, based on a formal risk assessment.
- 8.3. Asbestos management surveys will be undertaken at every change of tenancy, including following void periods, mutual exchanges, or tenancy transfers, to ensure continued safety and compliance.
- 8.4. Earlier inspections or re-surveys will be carried out where required by:
- 8.4.1. The outcome of previous asbestos assessments;
  - 8.4.2. Reports of concern from residents, staff or contractors;
  - 8.4.3. Findings from a risk based review.
- 8.5. Communal areas and non-domestic premises will be inspected and managed in line with:
- 8.5.1. Approved Code of Practice L143
  - 8.5.2. HSE guidance (e.g. HSG264, HSG227)
  - 8.5.3. Asset-specific asbestos risk profiling.
- 8.6 Where ACMs are identified, appropriate warning signage and information sharing protocols will be implemented, including updates to the Asbestos Register and communication with relevant stakeholders.
- 8.7 All remedial works involving ACMs will be carried out by licensed asbestos contractors, in accordance with regulatory requirements and manufacturer guidance where applicable.
- 8.8 All asbestos-related works—whether responsive or planned—will be completed by competent persons, with certification and competency verified through internal audit and contractor management processes.
- 8.9 Where access is not gained for inspections or remedial works, legal access procedures will be followed in line with the escalation protocol outlined in this policy, mirroring the approach used in other compliance areas to ensure resident safety and regulatory adherence.
- 8.10 Competent in-house teams may be deployed for the safe removal of non-licensed asbestos-containing materials, subject to:
- Formal risk assessment and method statement (RAMS),
  - Use of correct equipment and PPE,
  - Training in accordance with Regulation 10 (CAR 2012),

- Real-time monitoring and supervision.

All licensed or notifiable work will be undertaken by HSE-licensed asbestos contractors. HPG will maintain a clear threshold and decision-making protocol to determine when in-house or third-party resources are used.

## 9. Follow-on Works

9.1. All asbestos inspections and surveys will categorise findings in accordance with HSE guidance (e.g. HSG264 and HSG227), using the following classifications:

- 9.1.1. **High Risk:** ACMs in poor condition or likely to be disturbed;
- 9.1.2. **Medium Risk:** ACMs in fair condition but with potential for disturbance;
- 9.1.3. **Low Risk:** ACMs in good condition and unlikely to be disturbed;
- 9.1.4. **No ACM Identified:** No asbestos-containing materials found.

9.2. **High Risk ACMs:** Where asbestos-containing materials are identified as high risk, immediate action will be taken to either remove or encapsulate the material. Access to the affected area will be restricted until the risk is mitigated, and all actions will be documented in the Asbestos Register and Management Plan.

9.3. **Medium Risk ACMs:** Where ACMs are assessed as medium risk, remedial actions such as encapsulation, labelling, or restricted access may be implemented. These materials will be subject to enhanced monitoring and included in future reinspection schedules.

9.4. **Further Investigation Required:** If surveyors or contractors identify areas requiring further investigation—such as inaccessible voids, damaged materials, or unconfirmed suspect materials—a targeted reinspection or Refurbishment & Demolition (R&D) survey will be arranged within 7 calendar days or before any intrusive works commence.

9.5. **Low Risk or No ACM Identified:** Where ACMs are in good condition and pose minimal risk, they will be recorded and monitored as part of the routine reinspection cycle. No immediate action will be required unless conditions change.

9.6. **Unsatisfactory Survey Outcomes:** If a survey or inspection results in an unsatisfactory outcome—such as incomplete access, unverified materials, or conflicting data—follow-up actions must be completed before the property is cleared for occupation or further works.

9.7. **Documentation and Record Keeping:** All asbestos-related documentation—including survey reports, risk assessments, remedial action records, and clearance certificates—will be stored electronically in **CADRE** and **FILEIT**, and tracked to ensure compliance, audit readiness, and regulatory assurance.

## 10. Data and Records

- 10.1. CAR 2012 does not require asbestos information to be provided to tenants in domestic premises, Regulation 4 requires that information about the location and condition of asbestos in non-domestic premises (including communal areas in residential buildings) must be made available to anyone liable to disturb it, including contractors and emergency services. Sharing this with tenants is considered best practice, especially where refurbishment or maintenance is planned.
- 10.2. All asbestos-related documentation—including survey reports, reinspection records, remedial works certificates, and clearance documentation—will be stored electronically within CADRE and **FILEIT**.
- 10.3. CAR 2012 requires asbestos records (e.g. survey results, risk assessments, and management plans) to be kept up to date and readily accessible. Data will be retained by HPG for a minimum of 10 years, in line with best practice.
- 10.4. The **[INSERT MANAGEMENT LEVEL ROLE]** is responsible for ensuring ongoing data integrity, with all records maintained in real time and accessible for operational oversight, audit, and regulatory compliance.
- 10.5. All asbestos management safety data is processed in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

## 11. Resident Communication and Engagement

- 11.1. Residents will be provided with adequate notice ahead of all scheduled asbestos surveys, reinspections, or remedial works, in line with legal requirements and HPG's customer service standards.
- 11.2. Resident engagement forums will be used to involve tenants in the ongoing review and development of asbestos management practices, ensuring transparency, accountability, and continuous improvement in line with HPG's wider compliance strategy.

## 12. Competency and Training

- 12.1. **Contractor Qualifications and Licensing:** Contractors undertaking asbestos-related work must have their competency, training, and licensing status verified annually, including registration with the Asbestos Licensing Unit (ALU) where applicable, in accordance with CAR 2012 and HSE guidance L143.
- 12.2. **Internal Staff Training:** Internal staff involved in asbestos management, compliance monitoring, or service delivery must receive formal refresher training

every two years, aligned with their roles and responsibilities, and in accordance with Regulation 10 of CAR 2012, which mandates training for anyone liable to disturb asbestos during their work.

**12.3. Internal Operative Training:** In-house operatives engaged in the removal of non-licensed ACMs must also be included in HPG's competency matrix and subject to ongoing review to ensure their work complies with best practice and legal standards.

**12.4. Competency of Asbestos Workers:** All individuals carrying out asbestos surveying, removal, or remedial works on behalf of HPG must be:

- Trained and competent for the specific type of asbestos work (licensed, non-licensed, or notifiable non-licensed work),
- Medically surveilled where required,
- And, where applicable, licensed by the HSE for higher-risk activities.

**12.5. Training Matrix and Compliance Reviews:** HPG will maintain a training and competency matrix for all roles involved in asbestos-related activities. Quarterly reviews will be conducted to:

- Monitor compliance with CAR 2012,
- Identify training and medical surveillance needs,
- Support continuous professional development and legal adherence.

## 13. Performance Monitoring

**13.1.** HPG will monitor asbestos compliance using defined KPIs, including but not limited to:

- Percentage of properties with an up-to-date Asbestos Management Survey (as required under Regulation 4 of CAR 2012).
- Percentage of identified asbestos-containing materials (ACMs) with current condition assessments.
- Percentage of planned re-inspections completed within required timescales.
- Number of non-compliance incidents or uncontrolled disturbances of ACMs.

**13.2.** Asbestos management performance will be reported:

- Monthly to the Executive Management Team.
- Quarterly to the Audit Committee, including any exceptions, compliance risks, or emerging trends.

## 14. Quality Assurance

**14.1** A minimum of 10% of all asbestos surveys, reinspections, and remedial works will be subject to random audit by internal or external quality assurance teams. This includes:

- Verification of survey accuracy and completeness,
- Review of risk assessments and management plans,
- Validation of remedial actions and documentation

14.2 An independent auditor (e.g., a specialist consultancy) will conduct annual audits as part of HPG's audit and risk framework.

14.3 Audit findings will be used to:

- Strengthen internal processes and contractor performance.
- Deliver targeted debriefing or training for surveyors, dutyholders, and contractors.
- Identify trends and inform continuous service improvement in asbestos management.

## 15. Non-Compliance and Escalation


15.1. Any overdue asbestos surveys, reinspections, remedial actions, or **uncontrolled disturbances of ACMs** will be automatically flagged within the CADRE system (or equivalent compliance platform), in line with Regulation 4 of CAR 2012.

15.2. If an asbestos-related action is not completed within the required timeframe, or if an uncontrolled disturbance of ACMs occurs, the following escalation hierarchy will apply:

- **Step 1:** Escalation to the relevant Head of Service.
- **Step 2:** If unresolved, escalation to the Director of [placeholder].
- **Step 3:** Further escalation to the Executive Director of [placeholder].
- **Step 4:** Immediate notification to the EMT if a systemic risk or legal breach is identified.

15.3. This escalation process ensures that significant compliance risks, including the disturbance of asbestos, are:

- Promptly addressed,
- Investigated and mitigated,
- And escalated to senior leadership in accordance with dutyholder responsibilities under CAR 2012.

	<b>Policy Control Sheet</b> <b>X Policy</b> <b>Policy reference number - 2025/</b>
<b>Policy Author</b>	
<b>Direct Lead</b>	
<b>Version</b>	
<b>Target audience</b>	
<b>Consultation</b>	HPG customer consultation Employee group / managers - Senior Managers – Executive Management Group – X Committee
<b>Date of Equality Impact Assessment</b>	No individuals or groups of people are disadvantaged by the adoption of this policy <state if this is the case and the date that the EIA was completed>.
<b>Date of Data Privacy Impact Assessment</b>	State if one is not required or the date of completion.
<b>Approving Body</b>	
<b>Date of final approval</b>	
<b>Implementation date</b>	
<b>Monitoring arrangements</b>	
<b>Reporting</b>	
<b>Review date</b>	
<b>Expiry date</b>	
<b>Review cycle</b>	
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<b>Policy location</b>	SharePoint HPG Hub Housing Plus Group website

### Summary of changes table

Revision history			
Author	Summary of changes	Version	Authorised by & date