The Whiteley Homes Trust

Asbestos Management Policy

Written By	Pippa Claydon, Director of Operations
Owner	Pippa Claydon, Director of Operations
Original Policy Date	July 2026
Review Period	Annually or sooner following a significant asbestos incident, legislative or regulatory change, or organisational change
Next Review Date	July 2027
EIA	Yes

Review Tracker

Review Date	Reviewed by	Changes Made	Approved by	Approved date	Version
July 2026	**Director of Operations / Head of Property & Compliance**	**Complete rewrite to align with current legislation, Building Safety Act 2022, Social Housing (Regulation) Act 2023, Control of Asbestos Regulations 2012, current HSE guidance and the Regulator of Social Housing's Safety and Quality Standard**	**RECC** **Main Board**	**6/8/26** **15/9/26**	**2.0**

Introduction

At The Whiteley Homes Trust ("the Trust"), we are committed to providing homes, workplaces and communal facilities that are safe, well maintained and compliant with all statutory and regulatory requirements.

The Trust recognises that effective asbestos management is fundamental to protecting residents, employees, volunteers, contractors, consultants and visitors from the risks associated with exposure to asbestos fibres. While asbestos-containing materials (ACMs) are generally safe when in good condition

and left undisturbed, inappropriate maintenance, refurbishment, demolition or accidental disturbance can result in the release of hazardous fibres capable of causing serious and irreversible health conditions.

The Trust acknowledges that many buildings constructed before 2000, including a number of our historic and listed buildings within Whiteley Village, may contain asbestos-containing materials. The presence of asbestos does not necessarily present an immediate risk; however, it must be effectively identified, managed, monitored and controlled throughout the lifecycle of the building.

Effective asbestos management extends beyond compliance with legislation. It forms an integral part of the Trust's wider Building Safety, Asset Management and Health & Safety Management Systems, supporting our commitment to delivering safe homes, protecting vulnerable residents, preserving our historic estate and fulfilling our responsibilities as a Registered Provider of Social Housing regulated by the Regulator of Social Housing.

The Trust recognises that asbestos management is one of its core landlord health and safety responsibilities. Effective governance, accurate asset information, competent decision-making and robust assurance arrangements are essential to protecting residents, employees, contractors and visitors and maintaining compliance with the Regulator of Social Housing's Safety and Quality Standard.

The Trust is committed to adopting a proactive, risk-based approach to asbestos management through effective governance, competent management, planned surveying, regular inspection, robust contractor controls, resident engagement and continuous improvement.

This policy sets out how the Trust manages asbestos across all premises and assets for which it has responsibility. It establishes clear governance arrangements, defines responsibilities and describes the systems used to ensure compliance with legislation, regulatory expectations and recognised industry best practice.

Scope of Applicability

This policy applies to all individuals engaged with The Trust, including employees, agency workers, bank workers and volunteers. Throughout this policy, these groups are referred to collectively as *“employees”* for clarity and ease of reference.

It also covers residents including beneficiaries, tenants in our private let homes and their households. Throughout this policy, these groups are referred to collectively as “residents” for clarity and ease of reference.

In addition, this policy extends to Trustees, third-party stakeholders, including contractors, consultants, suppliers, surveyors, principal designers, principal contractors and external individuals or organisations that provide services on behalf of the Trust.

The policy applies to all buildings, structures, land and assets for which the Trust has legal responsibility, including but not limited to:

- Independent living cottages
- Huntley House

- Offices
- Community buildings
- Commercial premises
- Workshops
- Stores
- Garages
- Boiler houses and plant rooms
- Roof spaces and service risers
- Underground service ducts
- Outbuildings and ancillary structures
- Estate infrastructure
- Brownfield land and previously developed sites
- Buildings awaiting refurbishment or demolition

The policy applies to all asbestos-containing materials (ACMs), presumed ACMs and suspect materials located within premises under the Trust's control.

The Trust's responsibilities are determined by the relevant Licence to Occupy, tenancy agreement, lease or management agreement.

Where asbestos-containing materials fall outside the Trust's legal responsibility, the Trust will provide advice and guidance where appropriate to promote safe management and reduce the risk of accidental disturbance.

The Trust is committed to openness and transparency. By clearly defining the scope of this policy, we seek to promote understanding, accountability and confidence among residents, employees and stakeholders.

Purpose

The objectives of this policy are to ensure that:

- The Trust complies with all applicable legislation, Approved Codes of Practice, regulatory requirements and recognised industry standards relating to asbestos management.
- Suitable and sufficient asbestos surveys are undertaken across the Trust's property portfolio.
- An accurate and up-to-date Asbestos Register is maintained for all applicable premises.
- Asbestos-containing materials are identified, risk assessed, monitored and managed throughout their lifecycle.
- Appropriate control measures are implemented to prevent accidental disturbance of asbestos-containing materials.
- Refurbishment and Demolition Surveys are completed before any intrusive maintenance, refurbishment or demolition work commences.
- Only competent and appropriately qualified contractors undertake asbestos surveying, sampling, removal or remediation works.
- Residents, employees, contractors and visitors are protected from exposure to asbestos fibres.

- Asbestos management forms an integral part of the Trust's wider Building Safety, Asset Management and Health & Safety Management Systems.
- Appropriate financial and operational resources are allocated to maintain statutory compliance.
- A clearly identified Asbestos Responsible Person is appointed with sufficient authority, competence and resources to implement the Trust's Asbestos Management System and maintain compliance with the Control of Asbestos Regulations 2012.
- Performance is monitored through clearly defined Key Performance Indicators and reported regularly to the Executive Leadership Team, Resident Experience and Community Committee and Board.
- Residents receive appropriate information regarding asbestos where this is relevant to their home or planned works.
- Continuous improvement is achieved through regular auditing, incident investigation, learning from experience and responding proactively to changes in legislation, regulation and recognised best practice.

This policy shall be reviewed at least annually, or sooner following:

- A significant asbestos incident
- Accidental disturbance of asbestos-containing materials
- Enforcement action by the health and safety executive
- Significant changes in legislation or approved codes of practice
- Recommendations arising from audits or investigations
- Organisational restructuring affecting management responsibilities

This policy shall be reviewed at least annually, or sooner following:

- A confirmed case of Legionnaires' disease associated with Trust premises
- A significant water safety incident
- Changes in legislation, Approved Codes of Practice or guidance
- Recommendations arising from audits or investigations
- Significant refurbishment or alterations to water systems
- Organisational restructuring affecting management responsibilities

Legislative and Regulatory Framework

The Trust manages asbestos in accordance with all relevant legislation, Approved Codes of Practice, Health and Safety Executive guidance and recognised industry standards, including but not limited to:

Primary Legislation

- Health and Safety at Work etc. Act 1974
- Control of Asbestos Regulations 2012
- Management of Health and Safety at Work Regulations 1999
- Construction (Design and Management) Regulations 2015
- Building Regulations 2010 (as amended)

- Building Safety Act 2022
- Social Housing (Regulation) Act 2023
- Housing Act 2004
- Homes (Fitness for Human Habitation) Act 2018
- Environmental Protection Act 1990
- Hazardous Waste (England and Wales) Regulations 2005
- Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

Approved Codes of Practice and HSE Guidance

The Trust manages asbestos in accordance with current Health and Safety Executive guidance including:

- L143 – *Managing and Working with Asbestos (Approved Code of Practice)*
- HSG264 – *Asbestos: The Survey Guide*
- HSG247 – *The Licensed Contractors' Guide*
- HSG248 – *The Analysts' Guide*
- HSG210 – *Asbestos Essentials*
- HSG227 – *A Comprehensive Guide to Managing Asbestos in Premises*
- HSE Asbestos Essentials Task Manuals
- UKAS guidance relating to asbestos surveying and analytical services.

Regulatory Requirements

The Trust also manages asbestos in accordance with the expectations of:

- Regulator of Social Housing – Safety and Quality Standard;
- Regulator of Social Housing – Transparency, Influence and Accountability Standard;
- Housing Ombudsman Complaint Handling Code;
- Health and Safety Executive (HSE);
- Environment Agency;
- Local Authority Environmental Health where applicable.

Governance and Assurance

The Trust recognises that effective asbestos management is a critical component of landlord health and safety compliance and organisational resilience.

The Trust adopts the principles of the Control of Asbestos Regulations 2012 by ensuring clearly identified Duty Holders, Responsible Persons and Competent Persons are appointed to manage asbestos risks. These appointments are supported by defined responsibilities, appropriate training, adequate resources and regular performance monitoring to ensure statutory duties are effectively discharged.

The Trust also recognises that effective asbestos management is fundamental to providing safe, quality

homes. The Board will therefore receive regular assurance that asbestos risks are effectively managed and that the Trust continues to meet its statutory landlord compliance obligations in support of the Regulator of Social Housing's Safety and Quality Standard.

Asbestos management is delivered through a robust governance framework which includes:

- Clearly defined roles and responsibilities
- Competent Responsible Persons
- Comprehensive asbestos surveys
- A live Asbestos Register
- A documented Asbestos Management Plan
- Planned re-inspections of asbestos-containing materials
- Contractor competence assurance
- Refurbishment and Demolition Surveys
- Permit-to-work arrangements
- Regular compliance reporting
- Internal audit and independent assurance
- Board oversight of statutory compliance and landlord safety performance

Where legislation, Approved Codes of Practice or recognised industry guidance are revised, the Trust will review this policy and associated procedures to ensure continued compliance and adoption of best practice.

1. Roles and Responsibilities

1.1 Organisational Structure

The Trust's organisational structure for asbestos management is set out within the current organisational structure approved by the Board.

The Trust recognises the distinction between the **Duty Holder**, **Responsible Persons** and **Competent Persons** as defined within the **Control of Asbestos Regulations 2012**, the **Health and Safety at Work etc. Act 1974** and associated Health and Safety Executive (HSE) guidance.

Overall accountability for asbestos management rests with the **Chief Executive Officer (CEO)**, who acts as the organisational Duty Holder.

Operational responsibility is delegated through the **Director of Operations**, supported by the **Head of Property & Compliance**, who is appointed by the Chief Executive Officer as the Trust's **Asbestos Responsible Person**.

The Trust will ensure that individuals appointed to manage asbestos have the appropriate authority, competence, training and resources to discharge their responsibilities effectively.

The Trust's arrangements include:

- The **Chief Executive Officer** as the organisational Duty Holder with overall accountability for

asbestos management.

- The **Director of Operations** providing strategic oversight of the Trust's Asbestos Management System.
- The **Head of Property & Compliance** acting as the Trust's **Asbestos Responsible Person**, responsible for the day-to-day implementation of the Asbestos Management System and statutory compliance.
- The **Head of Estates & Facilities** supporting the management of asbestos risks associated with communal buildings, external infrastructure, estate assets and construction activities.
- A suitably qualified **Health & Safety Adviser** providing competent independent advice on asbestos legislation, risk management and continuous improvement.
- **Competent UKAS-accredited asbestos surveyors**, analysts and HSE-licensed asbestos removal contractors appointed to undertake specialist asbestos surveys, sampling, analytical services, air monitoring and licensed asbestos removal.
- **Managers and employees** undertaking asbestos-related duties only where they have received appropriate information, instruction, training and supervision.

The Trust adopts a **whole organisation approach** to asbestos management, recognising that effective control requires collaboration across all departments to protect residents, employees, contractors, volunteers and visitors.

The competence of those undertaking asbestos management duties will be reviewed regularly to ensure that training, continuing professional development and contractor performance remain effective and reflect current legislation and recognised good practice.

Duty Holder - Chief Executive Officer (CEO)

The Chief Executive Officer holds overall accountability for ensuring the Trust complies with all statutory and regulatory requirements relating to asbestos management.

Whilst operational responsibilities may be delegated, overall accountability remains with the CEO. The CEO is responsible for ensuring:

- This policy is implemented, adequately resourced and reviewed annually
- Suitable governance arrangements are maintained for asbestos management
- A competent asbestos responsible person is formally appointed
- Sufficient financial, technical and operational resources are available to maintain statutory compliance
- Appropriate arrangements are in place to identify, assess and manage asbestos risks across the trust's property portfolio
- Significant asbestos risks are escalated appropriately
- The board receives regular assurance regarding asbestos compliance and performance
- Asbestos management remains an integral part of the Trust's wider building safety, asset management and health and safety management systems

Director of Operations (Health & Safety Officer)

The Director of Operations acts as the Trust's Health & Safety Officer and provides strategic oversight of the Trust's Asbestos Management System. Responsibilities include:

- Monitoring compliance with this policy
- Ensuring asbestos management is embedded within the trust's health and safety management system
- Providing strategic oversight of landlord asbestos compliance
- Reviewing significant asbestos incidents, investigations and lessons learned
- Ensuring corrective actions arising from audits, inspections and investigations are implemented
- Commissioning independent audits where appropriate
- Maintaining oversight of strategic asbestos risks
- Reporting asbestos compliance, performance and significant risks to the executive leadership team, resident experience and community committee and Board
- Supporting continual improvement of the trust's asbestos management arrangements

Head of Property & Compliance (Responsible Person)

The Head of Property & Compliance is appointed by the Chief Executive Officer as the Trust's Asbestos Responsible Person and has delegated responsibility for the day-to-day management of asbestos across the Trust's property portfolio.

Acting on behalf of the Duty Holder, the Asbestos Responsible Person shall ensure asbestos risks are effectively identified, assessed, managed, monitored and reviewed so far as is reasonably practicable. Responsibilities include:

- Maintaining the Trust's Asbestos Register and ensuring it remains accurate, current and readily accessible
- Maintaining and implementing the Trust's Asbestos Management Plan
- Ensuring suitable Management Surveys, Refurbishment and Demolition Surveys and asbestos re-inspections are undertaken by competent, UKAS-accredited survey organisations
- Ensuring asbestos-containing materials are appropriately identified, risk assessed, monitored and managed throughout their lifecycle
- Ensuring Refurbishment and Demolition Surveys are completed before any intrusive maintenance, refurbishment or demolition works commence
- Ensuring remedial works identified through asbestos surveys, inspections or audits are completed within agreed risk-based timescales
- Ensuring asbestos information is made available to employees, contractors and others before work commences
- Commissioning and managing competent asbestos consultants, analysts and HSE-licensed asbestos removal contractors
- Ensuring all asbestos removal, encapsulation and remediation works comply with current legislation and recognised industry guidance
- Maintaining records of asbestos surveys, analytical reports, air monitoring, waste consignment notes and Certificates of Reoccupation

- Ensuring asbestos management information is accurately maintained within the Trust's compliance management system
- Ensuring asbestos risks associated with communal buildings, plant rooms, boiler houses, garages, workshops, stores and estate infrastructure are effectively managed
- Reviewing and approving contractor risk assessments and method statements (RAMS) before intrusive works commence
- Ensuring contractors have reviewed the asbestos register before carrying out work on trust premises
- Managing asbestos risks associated with planned maintenance, estate improvement works and capital investment projects
- Ensuring permit-to-work arrangements are implemented where required
- Monitoring contractor competence and performance
- Supporting investigations into accidental asbestos disturbance or significant asbestos incidents
- Providing quarterly compliance reports to the Director of Operations

Head of Estates & Facilities (Responsible Person - External Areas)

The Head of Estates & Facilities is responsible for supporting the safe management of asbestos risks associated with communal buildings, estate infrastructure, operational facilities and construction activities. Responsibilities include:

- Ensuring suspected asbestos-containing materials or damage to known asbestos-containing materials are reported immediately to the asbestos responsible person
- Supporting investigations into asbestos incidents and implementing lessons learned
- Working collaboratively with the asbestos responsible person to maintain accurate compliance records

Health & Safety Adviser (HSA) – Competent Person

The Trust's appointed Health & Safety Adviser acts as the competent person for asbestos management, providing independent professional advice and assurance. The Health & Safety Adviser will, through the Director of Operations:

- Provide competent advice on asbestos legislation, Approved Codes of Practice, HSE guidance and recognised industry best practice
- Support implementation and periodic review of this policy
- Monitor emerging legislation and regulatory requirements
- Assist in reviewing the Trust's Asbestos Management Plan and associated procedures
- Support investigations into asbestos incidents, accidental disturbances and dangerous occurrences
- Advise on RIDDOR reportability where applicable
- Support internal audits and independent compliance reviews
- Assist in maintaining the Trust's Corporate Health and Safety Risk Register
- Monitor implementation of corrective actions arising from audits, inspections and investigations
- Promote continuous improvement in asbestos management across the organisation

Head of Housing

Although the Housing Team is not responsible for statutory asbestos compliance, it plays an important role in supporting the effective management of asbestos within residents' homes. Responsibilities include:

- Supporting access to residents' homes for asbestos surveys, inspections and remedial works
- Identifying and reporting suspected damage to asbestos-containing materials reported by residents
- Sharing relevant information regarding vulnerable residents where appropriate to support safe management arrangements
- Supporting communication with residents before planned asbestos works
- Ensuring residents receive appropriate asbestos information where works are planned within their homes
- Supporting temporary decants where asbestos removal works require homes to be vacated
- Reinforcing resident responsibilities relating to asbestos and preventing unauthorised disturbance of building materials.

Heads of Departments (HODs)

Heads of Departments are responsible for ensuring asbestos risks are effectively managed within the buildings, services and activities under their control. Responsibilities include:

- Ensuring employees understand and comply with this policy and associated procedures
- Ensuring employees do not undertake intrusive work without first confirming the presence or absence of asbestos
- Ensuring employees know how to access asbestos information relevant to their work activities
- Ensuring suspected asbestos-containing materials are reported immediately and left undisturbed
- Supporting access for asbestos surveys, inspections and remedial works
- Ensuring employees complete mandatory asbestos awareness training where required
- Supporting investigations into asbestos incidents
- Implementing agreed corrective actions within required timescales
- Working collaboratively with the Property team to minimise disruption during asbestos inspections and removal works

As part of the HODs monthly meeting, the group will:

- Review asbestos compliance performance and any significant asbestos-related incidents
- Monitor completion of asbestos surveys, re-inspection programmes and remedial actions
- Consider lessons learned from audits, inspections and incident investigations
- Review emerging risks and changes in legislation or guidance
- Escalate significant asbestos risks or overdue high-risk actions to the executive leadership team and board where appropriate.

All Employees, Contractors & Volunteers

Everyone working for or on behalf of the Trust has a responsibility to contribute to maintaining safe

management of asbestos and to comply with this policy and associated procedures. Everyone must:

- Take reasonable care of their own health and safety and that of others who may be affected by their actions
- Comply with this policy and associated procedures
- Complete mandatory asbestos awareness training where required
- Never intentionally disturb or interfere with suspected asbestos-containing materials
- Report suspected asbestos-containing materials or damage to known asbestos-containing materials immediately
- Stop work immediately if previously unidentified or suspected asbestos-containing materials are discovered and follow the trust's emergency procedure
- Co-operate with asbestos surveys, inspections and remedial works.

Contractors must:

- Comply with the Trust's Contractor Management Policy
- Review the Asbestos Register before commencing work
- Provide evidence of competence, accreditation and licensing where appropriate
- Comply with approved Risk Assessments, Method Statements and permit-to-work arrangements
- Stop work immediately and notify the Trust if suspected asbestos-containing materials are encountered that are not recorded on the Asbestos Register
- Provide all statutory documentation, including waste consignment notes, air monitoring results and Certificates of Reoccupation where applicable.

Trustees

The Board of Trustees has overall responsibility for ensuring appropriate governance arrangements are in place to effectively manage landlord health and safety compliance, including asbestos management. Trustees are responsible for:

- Promoting a positive culture of health, safety and compliance throughout the Trust
- Ensuring asbestos risks are effectively identified, managed and monitored
- Receiving regular assurance regarding statutory asbestos compliance
- Ensuring sufficient financial, operational and technical resources are available to maintain compliance
- Scrutinising performance and challenging areas of non-compliance
- Monitoring compliance with the Regulator of Social Housing's Safety and Quality Standard and relevant legislation
- Supporting continuous improvement through review of audits, incidents, resident feedback and lessons learned
- Ensuring asbestos management remains an integral component of the Trust's overall landlord compliance framework

2. Asbestos Management System

The Trust operates a comprehensive Asbestos Management System designed to prevent exposure to asbestos fibres and ensure asbestos-containing materials (ACMs) are effectively identified, assessed, managed, monitored and controlled throughout their lifecycle.

The Asbestos Management System is based upon the principles of continual improvement (Plan – Do – Check – Act) and forms part of the Trust's wider Health and Safety Management System, Asset Management Strategy and Landlord Compliance Framework.

The Trust recognises that asbestos management is an ongoing process rather than a one-off exercise. Effective management relies upon maintaining accurate information, implementing appropriate control measures, undertaking regular inspections and ensuring asbestos information is readily available to anyone who may disturb the fabric of a building.

The Asbestos Management System comprises:

- Clearly defined governance and accountability arrangements
- Competent Responsible Persons and specialist contractors
- Comprehensive asbestos surveys
- An accurate and up-to-date Asbestos Register
- An Asbestos Management Plan
- Planned re-inspection programmes
- Asbestos risk assessments
- Contractor control arrangements
- Refurbishment and demolition survey arrangements
- Incident reporting and investigation
- Resident communication
- Audit and assurance
- Board oversight and performance reporting.

2.1 Objectives

The Trust's Asbestos Management System aims to:

- Prevent exposure to asbestos fibres
- Maintain safe homes, workplaces and communal buildings
- Ensure compliance with all relevant legislation and recognised industry guidance
- Identify asbestos risks before maintenance, refurbishment or demolition works commence
- Maintain accurate asbestos information across the trust's property portfolio
- Ensure asbestos-containing materials remain in a safe condition where removal is not required
- Minimise disruption to residents through effective planning
- Ensure competent contractors undertake asbestos-related work
- Promote continual improvement through regular monitoring, audit and review

2.2 Plan – Do – Check – Act

The Trust adopts the internationally recognised **Plan – Do – Check – Act (PDCA)** model to provide continual improvement in asbestos management.

Plan

The Trust will:

- Identify premises where asbestos may be present
- Commission appropriate asbestos surveys
- Assess asbestos risks
- Maintain the asbestos register
- Develop the asbestos management plan
- Allocate responsibilities and resources

Do

The Trust will:

- Implement the Asbestos Management Plan
- Undertake planned re-inspections
- Communicate asbestos information
- Control contractors
- Undertake remedial works
- Provide asbestos awareness training

Check

The Trust will:

- Monitor compliance with statutory requirements
- Review survey information
- Undertake audits
- Inspect asbestos-containing materials
- Review KPIs
- Investigate incidents

Act

The Trust will:

- Update asbestos records
- Review management arrangements
- Revise procedures where required
- Implement lessons learned
- Improve contractor performance
- Report improvements through the trust's governance arrangements

3. Asbestos Surveys

The Trust will ensure suitable and sufficient asbestos surveys are undertaken by competent, UKAS-accredited organisations to identify the presence, location, extent and condition of asbestos-containing materials within premises for which the Trust has responsibility.

The type of survey undertaken will be proportionate to the intended use of the building and the nature of the proposed works.

No intrusive maintenance, refurbishment or demolition work shall commence until appropriate asbestos information has been obtained and reviewed.

3.1 Management Surveys

Management Surveys are undertaken to locate, as far as reasonably practicable, the presence and condition of asbestos-containing materials that could be disturbed during normal occupation, routine maintenance or foreseeable building use. Management Surveys shall:

- Identify accessible asbestos-containing materials
- Assess material condition
- Assess the likelihood of disturbance
- Inform the asbestos register
- Support the asbestos management plan

3.2 Refurbishment and Demolition Surveys

Refurbishment and Demolition (R&D) Surveys shall be undertaken before any intrusive maintenance, refurbishment, alteration or demolition works. These surveys shall:

- Identify all asbestos likely to be disturbed by the proposed works
- Be fully intrusive where necessary
- Inform project planning
- Ensure asbestos is removed or safely managed before work commences

The Trust operates a **"No Survey – No Intrusive Work"** principle.

Where suitable asbestos information is unavailable, intrusive work shall not proceed until appropriate surveys have been completed.

3.3 Re-inspections

Known or presumed asbestos-containing materials shall be re-inspected at frequencies determined by risk assessment. The purpose of re-inspections is to:

- Confirm material condition
- Identify deterioration
- Review accessibility
- Reassess the likelihood of disturbance

- Determine whether additional control measures or removal are required

Inspection frequencies shall reflect:

- Material type;
- Material condition;
- Occupancy;
- Accessibility;
- Likelihood of disturbance;
- Previous inspection findings.

3.4 Sampling and Analysis

Where suspect materials are identified, samples shall only be taken by competent personnel.
Analysis shall be undertaken by UKAS-accredited laboratories. Sampling records shall be incorporated into the Trust's Asbestos Register.

4. Asbestos Register

The Trust shall maintain a comprehensive and accurate Asbestos Register for all premises where asbestos-containing materials are known or presumed to be present.
The Asbestos Register is the principal source of asbestos information and forms the basis of safe management decisions. The Register shall include, where applicable:

- Property details
- Survey information
- Asbestos location
- Asbestos type
- Asbestos product
- Condition assessment
- Material assessment score
- Priority assessment score
- Risk rating
- Photographs where appropriate
- Inspection dates
- Recommended actions
- Remedial works completed
- Review dates

The Register shall be:

- Maintained electronically where practicable
- Updated following surveys, inspections or remedial works
- Readily accessible to employees and contractors who require asbestos information before undertaking work
- Subject to regular quality assurance checks

- Superseded asbestos records shall be retained in accordance with the trust's document retention procedures

4.1 Communication of Asbestos Information

The Trust will ensure asbestos information is communicated to all persons who may disturb the fabric of Trust buildings. Before commencing intrusive work:

- Contractors shall review relevant asbestos information
- Employees shall be provided with appropriate asbestos information
- Project managers shall confirm appropriate surveys have been completed

Evidence that asbestos information has been reviewed shall be retained within project records.

5. Asbestos Risk Assessment and Management Plan

The Trust will maintain an Asbestos Management Plan for all applicable premises.

The Management Plan shall set out how asbestos-containing materials are managed throughout their lifecycle and shall be informed by the findings of asbestos surveys and risk assessments. The Plan shall include:

- Responsibilities
- Survey arrangements
- Re-inspection frequencies
- Monitoring requirements
- Contractor controls
- Permit-to-work arrangements
- Communication arrangements
- Emergency procedures
- Training requirements
- Audit arrangements
- Review procedures

5.1 Risk Assessment

The Trust adopts a risk-based approach to asbestos management. Each identified or presumed asbestos-containing material shall be subject to a risk assessment considering:

Material Factors

- Asbestos type
- Product type
- Surface treatment
- Material condition

Priority Factors

- Building occupancy

- Accessibility
- Likelihood of disturbance
- Maintenance activities
- Resident vulnerability
- Planned refurbishment

The **combined assessment** shall determine:

- Inspection frequency
- Monitoring requirements
- Remedial actions
- Encapsulation
- Repair
- Removal

5.2 Management Options

The Trust recognises that the presence of asbestos does not automatically require removal.

Management decisions shall be based upon risk assessment and may include:

Leave in Situ
Where asbestos-containing materials are in good condition and unlikely to be disturbed, they may remain in place and be managed through regular inspection.

Encapsulation
Where appropriate, asbestos-containing materials may be sealed or enclosed to prevent fibre release.

Repair
Minor defects may be repaired by competent contractors where appropriate.

Removal
Where asbestos-containing materials are significantly damaged, present an unacceptable risk or will be disturbed by planned works, removal shall be undertaken by competent contractors in accordance with statutory requirements.

5.3 Review of the Asbestos Management Plan

The Asbestos Management Plan shall be reviewed:

- Annually
- Following significant refurbishment
- Following asbestos removal works
- Following accidental disturbance
- Following enforcement action
- Following changes in legislation or guidance
- Following significant changes in building use

Any changes arising from reviews shall be incorporated into the Asbestos Register and communicated to relevant employees and contractors.

6. Contractor Management

6.1 General

The Trust recognises that contractors undertaking maintenance, refurbishment, servicing and construction activities present the greatest risk of inadvertently disturbing asbestos-containing materials.

The Trust will only appoint contractors who can demonstrate appropriate competence, experience and accreditation to undertake asbestos-related activities.

All contractors working on Trust premises must comply with:

- The Control of Asbestos Regulations 2012
- Construction (Design and Management) Regulations 2015
- The Trust's Contractor Management Policy
- This Asbestos Management Policy
- Project-specific Risk Assessments and Method Statements (RAMS)
- Permit-to-work arrangements where applicable

6.2 Contractor Competence

Prior to appointment, contractors undertaking asbestos-related activities shall provide evidence of:

- Relevant training and competence
- Appropriate licences where required
- UKAS accreditation (where applicable)
- HSE asbestos licence (for licensed works)
- Appropriate insurance
- Membership of recognised trade or professional bodies where applicable

Competence shall be reviewed periodically throughout the duration of the contract.

6.3 Access to Asbestos Information

Before commencing intrusive work, contractors shall:

- Review the Asbestos Register
- Review relevant survey information
- Confirm that asbestos information has been understood
- Identify any limitations in the available survey information
- Notify the Trust where additional surveys may be required

The Trust operates a "**No Survey – No Intrusive Work**" principle.

Where suitable asbestos information is unavailable, intrusive works shall not commence until appropriate surveys have been completed.

6.4 Permit to Work

A permit-to-work system shall be implemented where work presents an increased risk of disturbing asbestos-containing materials. Permits shall confirm:

- Asbestos information has been reviewed
- Required surveys have been completed
- Appropriate control measures are in place
- Emergency arrangements have been communicated

7. Planned Maintenance, Refurbishment and Development

The Trust recognises that refurbishment and planned maintenance activities present the greatest likelihood of disturbing asbestos-containing materials.

Before intrusive work commences the Trust shall ensure:

- Appropriate Refurbishment and Demolition Surveys have been completed
- Asbestos risks have been assessed
- Asbestos removal or remediation has been completed where necessary
- Asbestos information has been communicated to all relevant contractors
- Project documentation is updated

Project Managers shall ensure asbestos management forms part of project planning, procurement and contractor mobilisation.

Asbestos information shall be reviewed at all project gateway stages.

7.1 New Developments

Where new buildings are constructed, the Trust shall ensure:

- Asbestos-containing materials are not specified
- Construction products comply with current legislation
- Handover information is complete
- Building information is incorporated within the trust's asset management systems

8. Responsive Repairs

The Trust recognises that responsive repairs often involve intrusive work undertaken at short notice. Prior to commencing intrusive repairs:

- Asbestos information shall be reviewed
- Employees and contractors shall confirm whether asbestos may be present
- Additional surveys shall be commissioned where appropriate

Where previously unidentified suspect asbestos-containing materials are discovered:

- Work shall stop immediately
- The area shall be made safe
- The property team shall be informed
- Further investigation shall be arranged before work recommences

No employee or contractor shall intentionally disturb suspected asbestos-containing materials.

9. Resident Information and Responsibilities

The Trust is committed to providing residents with clear, accessible information regarding asbestos management. Where appropriate, residents will receive information regarding:

- The purpose of asbestos surveys
- Planned inspection programmes
- Asbestos removal works
- Safety precautions
- Temporary decant arrangements where required

Residents are encouraged to report:

- Damaged ceilings
- Damaged textured coatings
- Damaged floor tiles
- Damaged pipe insulation
- Any material they suspect may contain asbestos

Residents must not:

- Undertake structural alterations
- Remove ceilings
- Drill into building elements where asbestos information is unknown
- Remove floor coverings fixed with asbestos-containing adhesives

without obtaining the Trust's written permission.

The Trust will provide reasonable advice where residents intend to undertake improvements within their homes.

10. Training and Competence

The Trust is committed to ensuring that employees, managers and contractors possess the knowledge and competence necessary to manage asbestos safely. The Trust will ensure:

- Asbestos awareness training is provided to employees whose work may expose them to asbestos
- Managers understand their responsibilities under this policy

- Employees responsible for managing asbestos receive appropriate specialist training
- Refresher training is undertaken periodically
- Contractor competence is verified before appointment

Training compliance shall be monitored through the Trust's Corporate Training Matrix.

Training records shall be maintained in accordance with the Trust's document retention procedures.

11. Incident Management and Emergency Procedures

The Trust will investigate all asbestos-related incidents to determine root causes and identify opportunities for improvement.

Incidents include:

- Accidental disturbance of asbestos-containing materials
- Uncontrolled fibre release
- Damaged asbestos materials
- Unrecorded asbestos discoveries
- Contractor non-compliance

11.1 Emergency Response

Where asbestos is accidentally disturbed:

- Work shall cease immediately
- The area shall be isolated
- Access shall be prevented
- The head of property & compliance shall be notified immediately
- Specialist advice shall be obtained
- Air monitoring shall be arranged where required
- Remediation shall be undertaken by competent contractors

Residents and employees affected by the incident shall be kept informed throughout the response.

Where required, incidents shall be reported to the Health and Safety Executive in accordance with RIDDOR.

Lessons learned shall be incorporated into future management arrangements.

12. Monitoring, Audit and Performance Review

The Trust will monitor asbestos compliance through a programme of:

- Planned re-inspections
- Compliance monitoring
- Internal audits

- Contractor audits
- Independent specialist reviews
- Board reporting

Compliance performance shall be reviewed quarterly by the Executive Leadership Team.
Performance reports shall be presented to the Resident Experience and Community Committee and Board.

Audit findings, resident feedback, incidents and contractor performance shall be used to continually improve asbestos management arrangements.

13. Three Lines of Assurance

The Trust adopts a Three Lines of Assurance model to provide confidence asbestos risks are effectively managed.

First Line – Operational Management

Operational assurance is provided through:

- Implementation of the Asbestos Management Plan
- Maintenance of the Asbestos Register
- Planned inspections
- Contractor supervision
- Responsive repairs processes
- Planned maintenance

Second Line – Independent Oversight

Independent assurance is provided through:

- Health & Safety adviser
- UKAS-accredited surveyors and analysts
- Specialist asbestos consultants
- Contractor performance monitoring
- Internal audits

Third Line – Governance

Strategic assurance is provided through:

- Executive Leadership Team
- Resident Experience and Community Committee
- Board scrutiny
- External audit where commissioned
- Regulatory inspection

This approach provides assurance that asbestos risks are effectively governed, independently verified and subject to continuous improvement.

14. Policy Implementation and Review

This policy shall be communicated to all relevant employees and made available through the Trust's document management system.

Managers are responsible for ensuring that the requirements of this policy are implemented within their areas of responsibility and that evidence of compliance is maintained.

The Director of Operations shall review this policy at least annually, or sooner where:

- Legislation changes
- Approved Codes of Practice or HSE guidance are revised
- Significant asbestos incidents occur
- Enforcement action is taken
- Audit findings identify opportunities for improvement
- Organisational changes affect management responsibilities

The Director of Operations is responsible for ensuring that revised versions of this policy are approved by the Board and communicated throughout the organisation.