



ASBESTOS MANAGEMENT POLICY

Approved On	November 2025
Next Review Date	November 2028

1. Purpose

- 1.1 To effectively manage all asbestos containing materials across the property portfolio and to reduce the asbestos related risks to as low a level as is reasonably practicable.
- 1.2 To ensure asbestos works are properly scoped, serviced and managed in accordance with legal requirements and best practice.

2. References

- Health and Safety at Work etc. Act 1974
- Control of Asbestos Regulations 2012
- INDG 223 A Short Guide to Managing Asbestos in Premises
- HSG264 Asbestos: A survey guide
- HSG247 – *Asbestos: The Licensed Contractors' Guide*
- HSG248 – *Asbestos: The Analysts' Guide (2nd Edition)*
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
- Scottish Building Standards – Technical Handbooks (latest edition)
- Health and Safety Executive (HSE) Approved Codes of Practice (ACoP L143)
- The Construction (Design and Management) Regulations 2015 (CDM 2015)
This Plan recognises WSHA's obligations under **CDM 2015**, ensuring asbestos information is included in pre-construction documentation and project planning.

3. Asbestos Policy

The presence of an asbestos containing material in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, regular exposure – even at relatively low levels – can present a risk. As well as people employed in the building trades, inadvertent exposure (and consequent risk) can occur in other groups of people e.g., installers of burglar alarms, smoke detectors, etc. Maintenance and repair contracts will also take place in the future, and it is important, therefore, to have in place a management system which minimises the potential for exposure to asbestos.

Working with and managing asbestos materials is now very tightly regulated via several different Legislative provisions. The purpose of this Policy is to ensure that the Association complies with all current Legislation, Codes of Practice and Health and Safety Executive Guidance Notes.

3.1 Statement of Intent

It is the policy of the Association to ensure that, as far as is reasonably practicable, no persons are exposed to risks to their health due to exposure to any asbestos containing materials that may be present in any of the properties it owns or occupies.

3.2 Policy Statement

This Asbestos Policy conforms with the Health and Safety at Work etc. Act 1974 and the Control of Asbestos Regulations 2012. The Policy and Procedures will apply to all buildings and all individuals employed by the Association, to contractors/subcontractors engaged by the Association and to the Association 's tenants.

The Association 's Policy on asbestos is to:

- i) ensure the prevention of exposure to risks associated with asbestos containing materials.
- ii) ensure that any asbestos containing materials that may be present in any of its buildings are maintained in a condition to prevent the possibility of any harm to health occurring.
- iii) Promote awareness of the risks associated with asbestos-containing materials and the management procedures through structured induction and ongoing training of relevant staff.
- iv) All key staff involved in the delivery of this Policy — including the Duty Holder, Responsible Person, Asbestos Co-ordinator, and any operational officers — will undertake mandatory annual refresher training accredited by UKATA or IATP.
- v) WSHA will maintain training records within its digital HR and compliance system, and refresher training dates will be monitored through the annual audit programme to ensure continued competence. provide adequate resources to ensure the provision of appropriate information, instruction, and training.
- vi) ensure a commitment to comply with all relevant asbestos legislation, Approved Codes of Practice, Health and Safety Executive Guidance Notes and to commit to the safe disposal of any asbestos waste in accordance with the appropriate legislation.
- vii) ensure that an appropriate asbestos surveying process remains in place, taking account of the need for Asbestos Management, Refurbishment and Demolition Surveys in accordance with current legislation and maintain an Asbestos Register.
- viii) implement an effective asbestos management strategy in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, the material can be undertaken.
- ix) ensure that an appropriate system is installed, maintained, and implemented for the management of all asbestos containing materials identified in the Register. Such a system is to be capable of recording the risk, the needs, and priorities for treatment and/or removal.
- x) ensure that all Contractors and Sub Contractors engaged to carry out work on any of the Association 's buildings are provided with adequate information on asbestos which may be disturbed by their works.
- xi) ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate.
- xii) ensure Licensed Contractors and/or Sub Contractors carry out ALL Asbestos Major Works and Competent Contractors carry out all Asbestos Minor Works.
- xiii) ensure all Non – Licensed Contractors carrying out Asbestos Minor Works are trained in safe working procedures and have appropriate insurance cover for the work being carried out.
- xiv) ensure that relevant staff of the Association and contractors (as identified by a Training Needs Analysis) have appropriate training in this Policy and Procedures.

- xv) regularly review the Asbestos Management Policy and Procedures.

4. Asbestos Roles

Governance Structure and Defined Roles

WSHA has strengthened its asbestos governance framework to provide clear accountability and oversight of all asbestos-related activities. Responsibilities are defined in line with the Control of Asbestos Regulations 2012 and supporting HSE guidance.

- **Duty Holder – Director of Development & Asset Management**
 - Holds overall responsibility for ensuring that WSHA complies with all statutory requirements and the Asbestos Policy.
 - Ensures sufficient resources, governance, and review mechanisms are in place.
 - Approves the Asbestos Management Plan and reviews annual performance reports.
- **Responsible Person – Asset Manager**
 - Implements the Asbestos Policy and Management Plan on behalf of the Duty Holder.
 - Oversees asbestos management provision across all WSHA properties.
 - Ensures surveys, risk assessments, and asbestos registers are accurate and maintained.
 - Liaises with the Asbestos Co-ordinator to ensure all operational controls are followed.
- **Asbestos Co-ordinator – Senior Contracts & Compliance Officer**
 - Manages day-to-day asbestos operations, including surveys, reinspection's, and removal works.
 - Maintains the Asbestos Register and ensures all updates are accurately recorded.
 - Provides technical guidance and ensures contractors, consultants, and staff are informed of ACM locations prior to works.
 - Monitors compliance and reports performance data to the Responsible Person.

- 4.1 The defined roles will include an Asbestos Co-ordinator (Senior Contracts & Compliance Officer), who will be tasked with maintaining the Asbestos Register and for co-ordinating asbestos surveys and sampling as well as asbestos removal/remediation works. This role will also include liaison with 'non-asbestos' works contractors, ensuring that all appropriate asbestos information is provided and/or obtained and properly interpreted where works are liable to disturb the fabric of buildings.

5. Prohibition on Staff Handling Asbestos

- 5.1 Unless properly trained to do so, no Association staff will be permitted to handle or work on asbestos containing materials (ACM's).
- 5.2 In the event that the Association opts to handle ACM's (e.g., for the purposes of sampling), appropriate training will be provided, insurances obtained, and these procedures updated to reflect the acceptable process.

6. Identification of Suspect Material – Damaged, Disturbed or Previously Unidentified

- 6.1 It is the responsibility of all staff to report to the Asbestos Co-Ordinator if they suspect that disturbed or damaged asbestos containing materials may be present in a building owned or occupied by the Association. In a case where an accessible material is suspected of containing asbestos, and where this material may reasonably *become* disturbed, this would also apply.
- 6.2 In such cases, an external consultant having UKAS (United Kingdom Accreditation Service) accreditation for asbestos sampling and analysis, will be contacted to carry out identification.
- 6.3 If asbestos is identified within the sample, advice will be obtained from a competent consultant on the appropriate course of action.
- 6.4 Incident Response – Damage or Disturbance to Asbestos Materials
Where damage to any material known or suspected to contain asbestos has taken place and there is a risk of airborne fibre release, the Technical Officer attending site will take immediate control of the situation.
The Technical Officer will:
 - Stop all work immediately and isolate the affected area to prevent access or further disturbance.
 - Ensure any persons in the vicinity are removed safely, closing doors and openings to minimise fibre spread.
 - Arrange for a competent UKAS-accredited asbestos consultant to undertake inspection, sampling, and, where required, air monitoring to assess potential contamination.
 - Review the consultant's findings and, where necessary, instruct remedial or removal works through approved contractors in line with WSHA procedures.
 - Notify the Asbestos Co-ordinator once the situation has been managed, providing full details of the incident, findings, and actions taken.
 - Technical Officers will not disturb or collect samples from ACMs; only UKAS-accredited consultants are authorised to undertake sampling or air monitoring.

The Asbestos Co-ordinator will:

- Update the Asbestos Register and ensure all survey results, laboratory reports, and remedial documentation are uploaded to SharePoint and the relevant Job File.
- Maintain an incident log for audit and compliance review purposes.

All sampling and analysis must be carried out by an independent UKAS-accredited laboratory, and all related reports and certificates must be retained for future reference and regulatory compliance.

- 6.5 Details of air test results will be made available for inspection and record purposes.

- 6.6 Remedial action will be required when airborne fibre levels **exceed 0.01 f/cc**. The nature of the remedial work must be agreed with the Asset Manager/Maintenance Manger.

Note: 0.01 f/cc is the clearance indicator for the 4-stage clearance process. For non-licensed works or reassurance testing, remedial actions will follow competent analyst recommendations and HSE guidance.

- 6.7 When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). (Advice may be sought from a competent Asbestos Consultant to determine whether the incident is in fact RIDDOR reportable.)

The Asbestos Co-ordinator, in consultation with the Responsible Person, will prepare any RIDDOR report.

7. Asbestos Surveys and Management Plans – Normal Occupancy of Premises

- 7.1 Where Association premises and common areas of housing stock were built or renovated prior to 2000, an Asbestos Management Survey programme will be carried out by a competent UKAS accredited asbestos management consultancy. (HSE expects that no asbestos containing materials would be in use from 2000.) The surveyor and the Association should jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of 'representative' surveying across properties of the same archetype and construction date.
- 7.2 Note that current legislation does not subject 'domestic dwellings' to the requirement for Asbestos Management Surveys (although Refurbishment and Demolition Surveys are required – see below). However, the Association will take a view on whether to adopt the increasingly common stance of undertaking Management Surveys to domestic dwellings.
- 7.3 The findings of all surveys undertaken will be used to prepare a Register of asbestos containing materials (including their location and condition along with details on how best to manage / remediate the material) in all relevant premises.
- 7.4 An asbestos management plan will be developed and implemented, ensuring that all asbestos containing materials are properly managed. This will include procedures for re-inspecting materials and carrying out remedial works where necessary.
- 7.5 For the avoidance of doubt, such an asbestos management plan will be necessary where any amount of asbestos is known or suspected to be present in premises. Each Plan's depth and complexity may vary, depending upon the local circumstances and potential risks involved (e.g., at a basic level a summary of actions in the asbestos register may be deemed acceptable), but all will clearly demonstrate their intended purpose of managing the risks associated with ACM's.

- 7.6 The “Asbestos Co-ordinator” will be responsible for maintaining the Registers and Plans, organising surveys and re-inspections, etc.

8. Asbestos Surveys – Prior to Work on Premises

- 8.1 Prior to any work being carried out on the fabric of (pre-2000) buildings, the asbestos register will be interrogated to determine whether asbestos may be encountered and appropriate precautions (including the use of HSE licensed contractors where necessary) will be taken. Where the works are likely to disturb material not included in the registers (e.g., behind wall panels, within voids, etc.), 8.2 will apply.
- 8.2 Prior to any refurbishment, demolition or repair works on building fabric, which is not known to be asbestos free, a competent UKAS accredited asbestos management consultancy will be commissioned to carry out a ‘Refurbishment or Demolition’ (i.e., intrusive) asbestos survey of the area to be worked upon. The surveyor and the Association should jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of ‘representative’ surveying across properties of the same archetype and construction date.
- 8.3 Prior to works starting, the information obtained from Refurbishment/Demolition Surveys will be discussed with the proposed works contractor (or internal direct works staff) to ensure that ACM’s will not be disturbed by their works. If works would have the potential to disturb ACM’s, appropriate measures will be taken, including the prior removal of ACM’s, amendments to work programme, etc
- 8.4 Records of all surveys and discussions with contractors will be retained in the Job File to demonstrate that asbestos was properly considered, and appropriate actions taken to prevent disturbance and exposure.

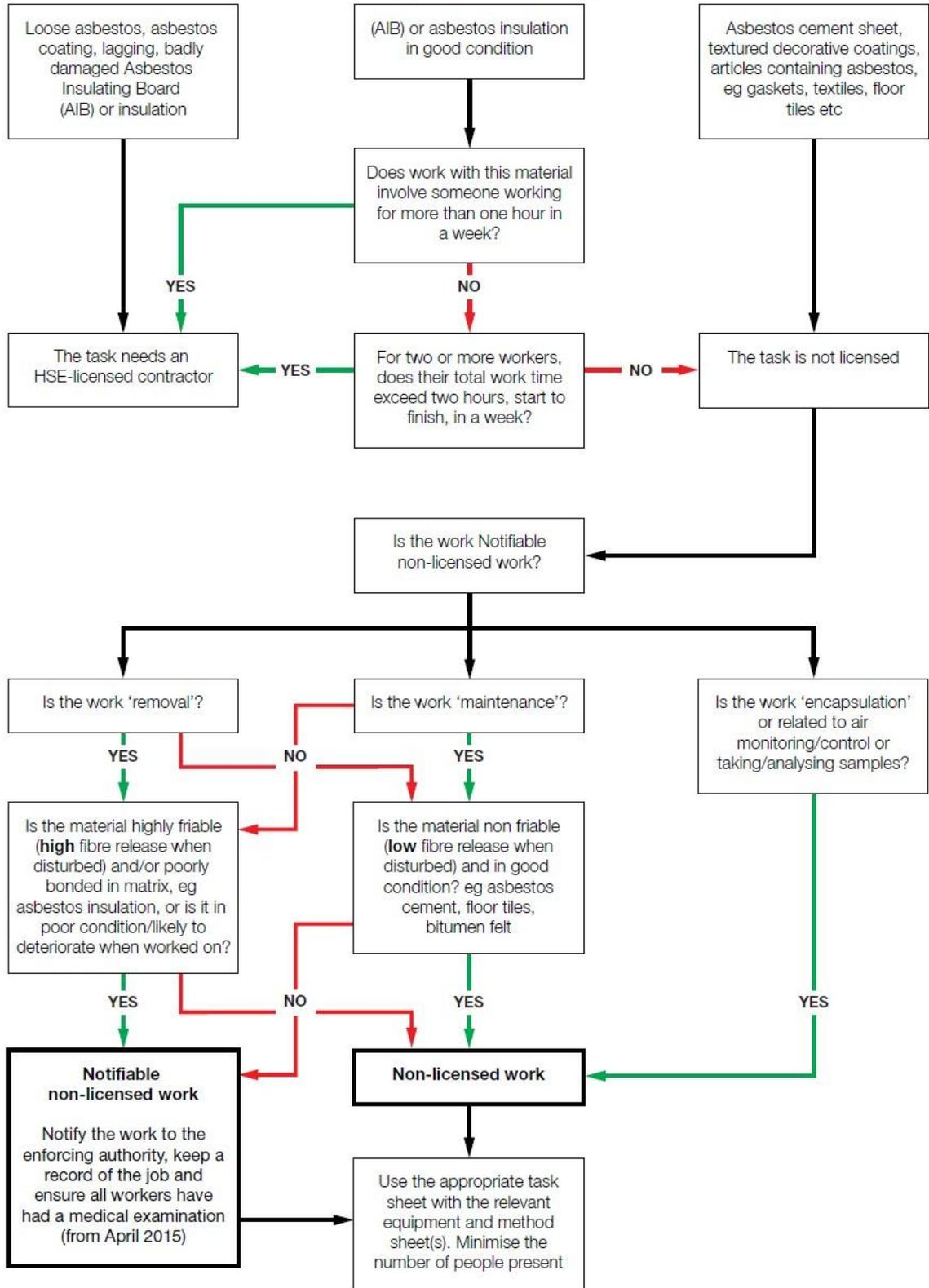
9. Work with Asbestos Materials

- 9.1 Most work likely to disturb or remove asbestos must be carried out by an HSE licensed asbestos removal contractor and notified to the HSE 14 days prior to commencement. However, the Control of Asbestos Regulations 2012 does allow work with certain lower risk asbestos containing materials (e.g., asbestos cement and asbestos textured coatings) to be carried out by non-licensed personnel and without notification to the HSE. The three categories of asbestos work are:
- Major Works: Licensed works – 14-day notification and licenced contractor (highest risk work)
 - Minor Works: Notifiable non-licensed works – notification before works start and competent (non-licensed) contractor
 - Minor Works: Non-notifiable non-licensed works – no notification and competent (non-licensed contractor)

The following HSE flowchart shows the decision-making process on appropriate classification of works:

Decision flow chart

Use this simple flow chart to help you decide who needs to do the work:



- 9.2 Where any doubts exist over the correct classification or scope of asbestos works, advice will be sought from a competent UKAS accredited asbestos management consultancy prior to any works being carried out on asbestos containing materials. The Association may also appoint a competent Asbestos Project Management consultancy to scope, specify, tender and project manage asbestos contracts.
- 9.3 Where work does not require to be carried out by licensed contractors (i.e., Minor Works) it will, nevertheless, be undertaken in a safe manner, by appropriately trained personnel, reducing the generation of airborne dusts to as low a level as is reasonably practicable. All method statements and risk assessments for such work will be screened by a competent person prior to work commencing.
- 9.4 Where licensed contractors are required to carry out asbestos works, the following documentation will be requested from the contractor prior to commissioning, and copies kept in the job file:
- current asbestos licence check on HSE website
 - insurance certificate indicating the insured is covered for asbestos work
 - a representative sample of medical examination certificates (conducted by an Employment Medical Advisory Service registered doctor) for personnel who will work on the job
 - a representative sample of training records for all personnel who will work on the job (asbestos management and handling courses), usually provided by a United Kingdom Asbestos Training Association (UKATA) member
 - where applicable, notification of the job to the HSE 14 days prior to commencement
 - method statement and risk assessment for the job (Plan of Work)

At the conclusion of all asbestos works (unless included within an Asbestos Project Management package), WSHA will directly appoint an independent UKAS-accredited Asbestos Analyst to carry out the required level of inspection and air testing.

For licensed works, this will include the full four-stage clearance process; for minor or non-licensed works, this will include visual inspection and reassurance air testing as appropriate.

To ensure impartiality and compliance with *HSG248: The Analysts' Guide (2nd Edition)*, analysts will not be appointed or subcontracted by the removal contractor under any circumstances. Analytical reports, clearance certificates, and air test results must be submitted directly to WSHA's Responsible Person and uploaded to both SharePoint and the Job File for audit and record-keeping.

Record Management and Audit Trail

To ensure full traceability and compliance with internal and regulatory audit requirements, WSHA mandates that all asbestos-related documentation is stored in **two locations**:

1. **SharePoint**: for centralised digital storage and organisational access.
2. **Individual Job File**: for on-site reference, verification, and contractor audit purposes.

Documents to be retained include asbestos survey reports, sampling certificates, risk assessments, Plans of Work, air monitoring results, clearance certificates, and tenant communications.

The Responsible Person will conduct quarterly checks to confirm all asbestos records are uploaded correctly and are consistent between systems. Any discrepancies must be resolved immediately to maintain the integrity of WSHA's asbestos information database.

10. Tenant Information and Work Procedures

- 10.1 The Association will establish its policy on informing tenants of the possibility of ACM's being present in pre-2000 housing and on the requirements for undertaking work on their dwellings. Any such information will be subject to a formal distribution procedure.

WSHA has formalised its tenant communication process to ensure all information about asbestos is delivered clearly, consistently, and in accessible formats.

- **Standard Information Pack**: Every tenant moving into a pre-2000 property will receive an asbestos information leaflet titled "*Managing Asbestos in the Home.*" This leaflet explains what asbestos is, where it may be found, and safe practices for tenants.
- **Digital Access**: All tenants can access asbestos information online via WSHA's website and digital leaflet link, which is included in every asbestos-related communication.
- **Survey Notifications**: When asbestos is identified or reinspected within a property, WSHA will issue a formal letter confirming the type, location, condition, and next inspection date.
- **Completion Confirmation**: Following any remedial or removal works, tenants will receive confirmation that the area has been inspected and deemed safe.
- **Communication Record**: All tenant notifications (letters, emails, SMS) will be logged in the digital Asbestos Register to provide a full audit trail.

- 10.2 Prior to a tenant starting work which will interfere with the fabric and/or services of a property, tenants will be required to seek advance permission from the Association. Before issuing permission, the Asbestos Register will be consulted and, where ACMs are identified within the proposed work zone the Maintenance Team will liaise with the tenant to ensure all appropriate actions are taken. Where the asbestos data is inconclusive (e.g., where a Refurbishment Survey has not been carried out, the Association will review the request and decide whether to refuse permission or to arrange for a Refurbishment Survey to be carried out.

- 10.3 In the event that tenants' works are liable to disturb ACM's, the Association will make a decision on the appropriate course of action, ensuring that all asbestos works are subject to the normal asbestos work procedures of the Association.