

Asbestos In Tenancies Policy

Prepared by	Compliance Officer
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Corporate Fit	Internal Management Plan	✓
	Risk Register	✓
	Business Plan	✓
	Equalities Strategy	✓
	Legislation	✓

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 乐意翻译

Our policies provide a framework to underpin our vision and values, to help us achieve our strategic objectives.

Our Vision

Local people, local control.

By providing quality homes and services, we will create stronger communities and a better quality of life for our customers.

Our Values

- Focused on the needs of our customers and communities.
- Supportive of our staff and Committee members.
- Responsible, efficient, and innovative.
- Open and accountable.
- Inclusive and respectful.
- Fair and trustworthy.

Strategic Direction

Consolidation and improvement: Applicable to our core business as a landlord & property manager.

Growth: Through the new build opportunities, we are taking forward.

Partnerships: Where this can help to address shared goals and increase capacity and value.

Resilience: A key priority across all parts of our business.

Strategic Objectives

Services: Deliver quality, value for money services that meet customers' needs

Homes & neighbourhoods: Provide quality homes and neighbourhoods.

Assets: Manage our assets well, by spending wisely.

Communities: Work with local partners to provide or enable services and activities that benefit local people and our communities as a whole

Our people: Offer a great workplace environment that produces a positive staff culture and highly engaged staff.

Leadership & Financial: Maintain good governance and a strong financial business plan, to ensure we have the capacity to achieve our goals.

Our Equalities and Human Rights Commitment

We understand that people perform better when they can be themselves and we are committed to making the Association an environment where employees, customers, and stakeholders can be open and supported. We promote equality, diversity, and inclusion in all our policies and procedures to ensure that everyone is treated equally and that they are treated fairly on in relation to the protected characteristics as outlined in the Equality Act 2010.

Privacy Statement

As data controller we will collect and process personal data relating to you. We will only collect personal information when we need this. The type of information we need from you will vary depending on our relationship with you. When we ask you for information, we will make it clear why we need it. We will also make it clear when you do not have to provide us with information and any consequences of not providing this. We are committed to being transparent about how we collect and use your data, and to meeting our data protection obligations with you. Further information about this commitment can be found within our full Privacy Statements.

Policy Scope & Review

For the purpose of this policy the term Association will include all members of the Tollcross Housing Association Limited. Therefore, all employees, governing body members, volunteers, customers and other relevant stakeholders will be expected to adhere to this policy and/or procedure. All policies and procedures are reviewed every 3 years in line with best practice and current legislation. The Association reserves the right to make additions or alterations to this policy and procedure from time to time. Any timescales set out in this policy may be extended where required.

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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

- 2.1.
 - 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

3. Asbestos Policy

- 3.1. 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 a number of different Legislative provisions. The purpose of this Policy is to ensure that the Housing Association complies with all current Legislation, Codes of Practice and Health and Safety Executive Guidance Notes.

- 3.2 Statement of Intent: It is the policy of the Housing 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.
- 3.3 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/sub-contractors engaged by the Housing Association and to the Housing Association's tenants.
- 3.4 The Housing 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 so as to prevent the possibility of any harm to health occurring.
 - iii) promote awareness of the risks from asbestos containing materials and the Management Procedures through training and induction of relevant staff. Key staff involved in the delivery of this Policy will receive annual re-training.
 - iv) provide adequate resources to ensure the provision of appropriate information, instruction and training.

- v) 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.
- vi) 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.
- vii) 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.
- viii) 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.
- ix) ensure that all Contractors and Sub-Contractors engaged to carry out work on any of the Housing Association's buildings are provided with adequate information on asbestos which may be disturbed by their works.
- x) ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate.
- xi) ensure Licensed Contractors and/or Sub Contractors carry out ALL Asbestos Major Works and Competent Contractors carry out all Asbestos Minor Works.
- xii) 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.
- xiii) ensure that relevant staff of the Housing Association and contractors (as identified by a Training Needs Analysis) have appropriate training in this Policy and Procedures.
- xiv) regularly review the Asbestos Management Policy and Procedures.

4. Asbestos Roles

- 4.1 Whilst the Senior Manager for Landlords Facilities Health, Safety and Welfare will have responsibility for the overall asbestos management system, the Housing Association will define and allocate roles and responsibilities to ensure the fulfilment of the policy and procedures on a practical level.
- 4.2 The defined roles will include an Asbestos Co-ordinator, 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 Housing Association staff will be permitted to handle or work on asbestos containing materials (ACM's).
- 5.2 In the event that the Housing 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 Housing 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 Where damage to any material known to contain asbestos has taken place, and is likely to give rise to airborne respirable fibre release, the Asbestos Co-ordinator will arrange for isolation of the area pending an investigation. The Co-ordinator will arrange for air monitoring tests (measurement of airborne fibre concentrations) to be carried out and sampling and analysis will be carried out by an independent UKAS accredited contractor to determine the level of any potential contamination, or to provide reassurance that unacceptable contamination has not occurred.
- 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 Senior Manager responsible for .
- 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.)

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

- 7.1 Where the Housing 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 Housing 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.

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 Housing Association will take a view on whether to adopt the increasingly common stance of undertaking Management Surveys to domestic dwellings.

- 7.2 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.
- 7.3 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. *See Appendix 2*
- 7.4 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.

- 7.5 The "Asbestos Co-ordinator" will be responsible for maintaining the Registers and Plans, organising surveys and re-inspections, etc.
- 7.6 The Housing Association will have emergency procedures in place for the disturbance of ACMs. See *Appendix 3*.

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 Housing 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. In the event that 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

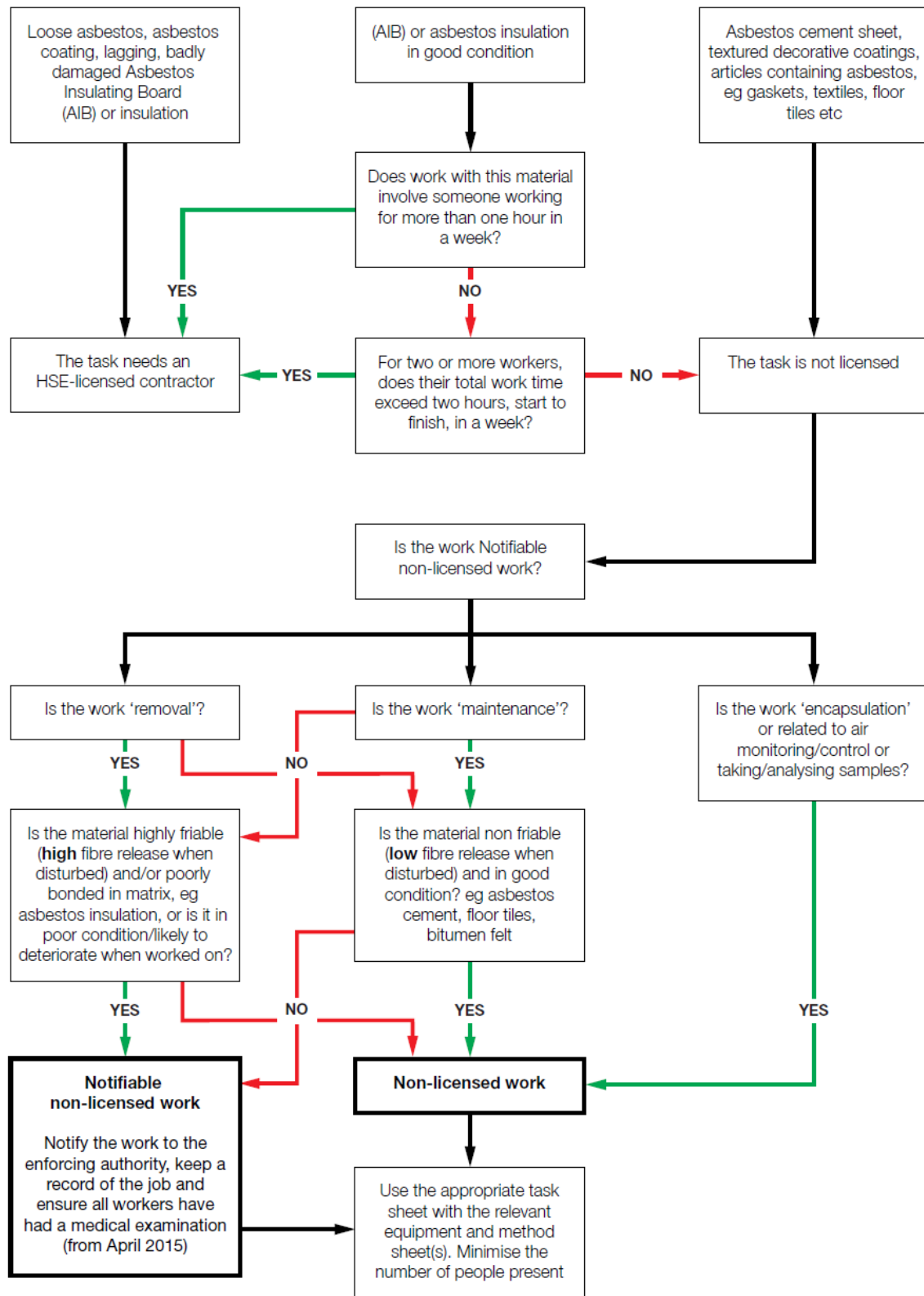
9. Work with Asbestos Materials

- 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 exists 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 Housing 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)
- 9.5 At the conclusion of all asbestos works (unless included within an Asbestos Project Management package), the Housing Association will directly appoint a UKAS accredited Asbestos Analyst to carry out the required level of inspection and test. For licensed works this will include a '4-stage clearance test' and for minor works this will include a visual inspection and reassurance air test. Care will be taken to ensure this is EXCLUDED from the contractor's initial proposal and price.

10. Tenant Information and Work Procedures

- 10.1 The Housing 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.
- 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 Housing Association. Before issuing permission, the Asbestos Register will be consulted and, where ACM's 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 Housing 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 Housing 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 Housing Association.

Appendix 1 – Equality & Human Rights Impact Assessment

Policy	Asbestos in Tenancies		
EIA Completed by	Joe Wilson, Technical Director	EIA Date	31 March 2025

- 1. Aims, objectives, and purpose of the policy / proposal**
 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.
- 2. Who is intended to benefit from the policy / proposal?**
 Tenants, staff, contractors.
- 3. What outcomes are wanted from this policy / proposal?**
 To keep tenants, staff and contractors safe and ensure that all reasonable steps are taken to ensure asbestos works are properly scoped, serviced and managed in accordance with legal requirements and best practice.
- 4. Which protected characteristics could be affected by proposal?**

<input type="checkbox"/> Age	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Religion or belief
<input type="checkbox"/> Disability	<input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Sex
<input type="checkbox"/> Race	<input type="checkbox"/> Pregnancy and maternity	<input type="checkbox"/> Sexual orientation
- 5. If the policy / proposal is not relevant to any of the protected characteristics listed in part 4, state why and end the process here.**
 Asbestos management is a legislative requirement. Although the protected characteristics are not relevant, the Association must ensure all reasonable steps have been taken to comply with the legal requirements.
- 6. Describe the likely impact(s) the policy / proposal could have on the groups identified in part 4**
- 7. What actions are required to address the impacts arising from this assessment? (This might include; collecting data, putting monitoring in place, specific actions to mitigate negative impacts).**
- 8. Consider the impact and actions to be considered for the following Human Right articles:**

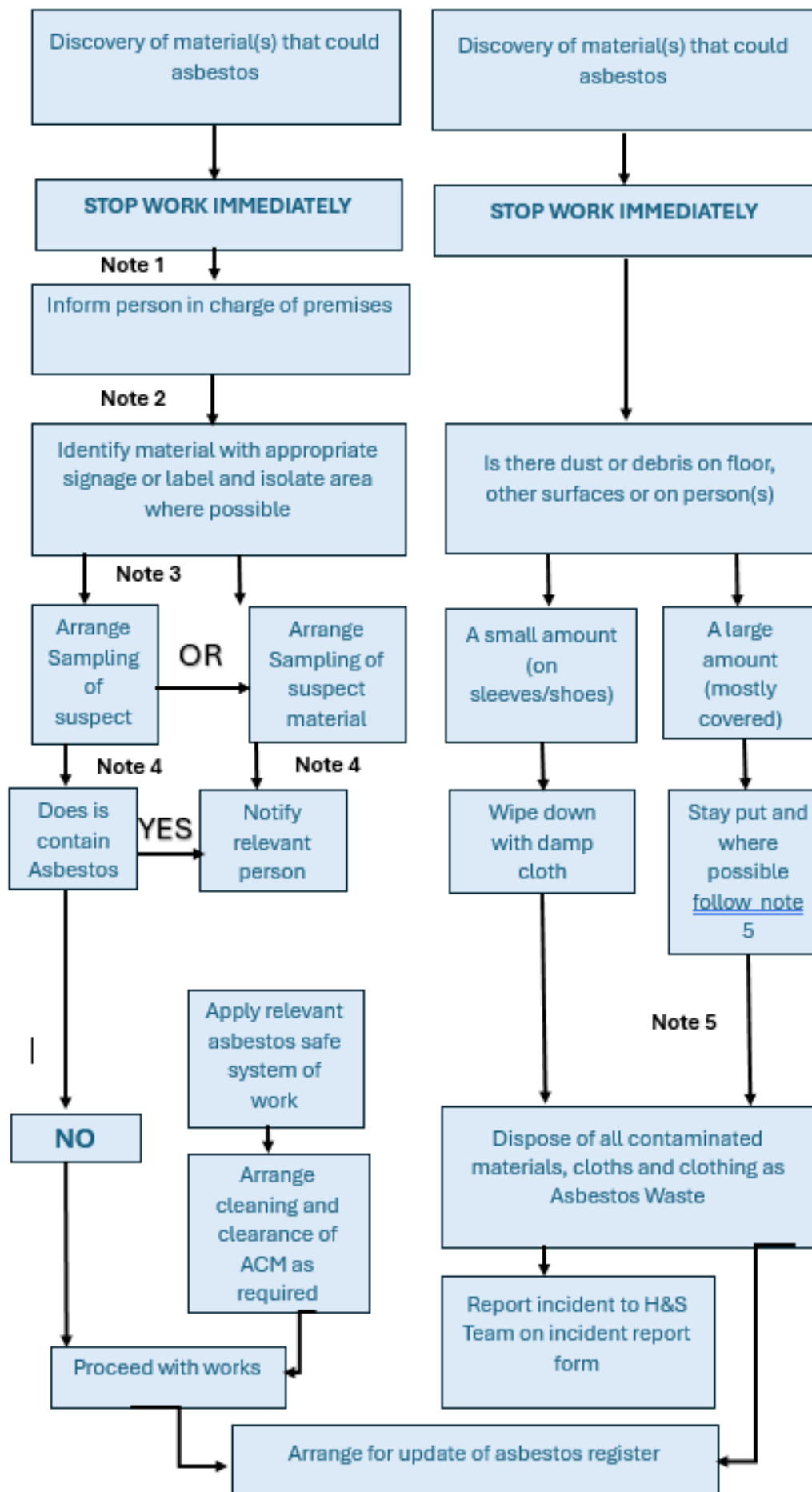
Article 6: Right to a fair trial Everyone should be given the opportunity to participate effectively in any hearing of their case and present their side.	
Impact: N/A	Actions: N/A
Article 8: Right to respect for private life, family life & the home Everyone has the right to access and live in their home without intrusion or interference.	
Impact: N/A	Actions: N/A
Article 14: Prohibition of discrimination Everyone has equal access to the other rights contained in the Human Rights Act.	
Impact: N/A	Actions: N/A

Appendix 2 – Asbestos Management Plan

Control of Asbestos – Asbestos Management Plan

1. Establish and maintain a comprehensive group asbestos register, in accordance with HSE Guidance Note HSG 264.
2. Carry out regular programmes of asbestos management surveys in relevant premises to identify, where reasonably practical, asbestos containing materials (ACMs) in reasonably accessible parts of dwellings and related assets through the engagement of UKAS accredited asbestos surveying company.
3. Risk assess the condition of any ACMs identified in relevant premises.
4. Implement arrangements to manage the risk arising from identified ACMs to include regular inspection of these.
5. Ensure that the relevant enforcing authority is notified of all notifiable work concerning asbestos.
6. Ensure that any potential manipulation of ACMs is carried out in compliance with current legislation, guidance and codes of practice issued by the Health and Safety Executive and other recognized industry standards.
7. Ensure that all work which may disturb or manipulate ACMs is carried out, where appropriate, by approved licensed asbestos contractors.
8. Ensure written plans of work relating to the removal and / or containment of ACMs are prepared and compliant with any legislative requirements and current best practice, prior to work commencing.
9. Monitor and maintain asbestos contractor's performance on asbestos work carried out.
10. Update the asbestos register as necessary after any subsequent survey, treatment or removal of ACMs.
11. Provide information about the presence, location and condition of ACMs to employees and any other person who may encounter asbestos, including contractor and tenants.
12. Provide regular, suitable and sufficient training to staff on real asbestos risks and how to manage them.
13. Consult with tenants, employees and appropriate groups prior to any large contract where ACMs may be disturbed.
14. Publish and maintain the Tollcross Housing Association Asbestos Policy and Management Plan and make the information contained in the Asbestos Register through the asset management system available to staff, customers and contractors working on behalf of Tollcross Housing Association.

Appendix 3 – Asbestos Emergency Procedures



Note 1:

Check asbestos register. Where information is unconfirmed, incident should be treated as ACM

Note 2:

Person(s) responsible for property should be notified immediately.

Note 3:

Isolate and control access to affected area allowing only authorised persons with appropriate PPE into area.

Note 4:

Where asbestos incident occurs in domestic dwelling then consideration may need to be given to a customer decant. This should be discussed with housing director and relevant asbestos coordinator in the first instance.

Note 5: Emergency Procedure

1. Avoid inhaling dust
2. Fix face mask if possible
3. Damp wipe down clothing and face mask
4. Move away from source
5. Remove outer clothing where possible
6. Damp wipe exposed areas.
7. Dispose of clothing and wet rags in sealed bag.
8. Shower / wash as necessary
9. Report incident to line manager