



ASBESTOS MANAGEMENT POLICY (AM-Policy)

Asset Management and Investment
Corporate and Housing

Versions	Date Approved	Approver (Name, Position and Signature)
LBH/AP/v3.1	26.02.2025	Paul Perkins / Nick Ljustina
LBH/AP/v2.3	10.01.2024	Paul Perkins / Fiona Leonard
LBH/AP/v2.2	18.05.2023	Paul Perkins / Fiona Leonard

Policy Document Content	Page
1.0 Introduction	2
2.0 Aims and Objectives	2
3.0 Scope	2
4.0 Legislation	3
5.0 Policy Statement	3
6.0 Duty Holder and Appointed Person	4
7.0 Management Arrangements	5
7.1 Asbestos Surveys	5
7.2 Asbestos Removals and Remedials	5
7.3 Air testing	6
7.4 The Asbestos Register	6
7.5 Training provision	6
7.6 Asbestos Management Plan Review	7
7.7 Policy Review	7
8.0 Contacts	7

1. Introduction

- 1.1. The London Borough of Hounslow (The Council) is committed to acting as a Responsible Landlord and fulfil its legal responsibilities, in compliance with the Control of Asbestos Regulations 2012 (CAR 2012) and other related regulations and standards.

2. Aims and objectives.

- 2.1. The Council is committed to eliminate or reduce the risks as far as reasonably practicable arising from exposure to asbestos containing materials (ACMs), which may be present in its properties.
- 2.2. The Council's policy will outline the management responsibilities to have a structure in place to manage asbestos within the Council owned and managed residential buildings and corporate properties to incorporate the following.
 - 2.2.1. The Asbestos Management Plan (AM-Plan)¹ – Corporate and Housing. Further details on the AM-Plan will be covered in 7.6 below.
 - 2.2.2. The Asbestos Register currently on Shine and Civica.
 - 2.2.3. A competent Asbestos Management Team within the Council and Lampton Services.
 - 2.2.4. A competent LBH project delivery team to cover works across the scope outlined in Section 3 below.

3. Scope

- 3.1. This policy applies to the Council owned and managed residential and corporate properties, and to any property where the Council has a legal responsibility for maintenance, repairs, enhancements, and upgrades.
- 3.2. This includes, and is not limited, to the following:
 - 3.2.1. General Needs Housing and garages
 - 3.2.2. Supported Housing and Sheltered Housing
 - 3.2.3. Offices and depots
 - 3.2.4. Community centres
 - 3.2.5. Libraries and leisure centres
 - 3.2.6. Schools and other education premises
 - 3.2.7. Retail or commercial units
 - 3.2.8. Parks and allotments
 - 3.2.9. Any other buildings owned and managed by the Council

¹ Asbestos Management Plan (AMP) is available on request from LBH Asbestos Management Team

4. Legislation

- 4.1. The Council shall comply with the following legislation² and relevant applicable updates:
- 4.1.1. Health and Safety at Work Act 1974
 - 4.1.2. Housing Act 2004
 - 4.1.3. Control of Asbestos Regulations 2012 (CAR 2012)
 - 4.1.4. Management of Health and Safety at Work regulations 1999
 - 4.1.5. Housing Health and Safety Rating System (HHSRS) 2005
 - 4.1.6. Control of Substances Hazardous to Health Regulations 2002
 - 4.1.7. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
 - 4.1.8. Construction (Design and Management) Regulations 2015 (CDM 2015)
 - 4.1.9. Hazardous Waste Regulations 2005

5. Policy Statement

- 5.1. The Council's Health and Safety policy states its commitment to providing a safe working environment. Not just for its staff but also for all those who may be affected by our activities, tenants of the homes we own and manage, our employees, school children, contractors and suppliers and the public who visit our estates.
- 5.2. In recognition of this commitment, the Council acknowledges the serious health hazards associated with exposure to materials containing asbestos when disturbed during work or when not managed.
- 5.3. We accept responsibility under the Health and Safety at Work Act 1974 and Control of Asbestos Regulations (CAR) 2012 to protect our employees and any other persons who may be at risk from asbestos in the buildings that we own, lease, and manage. We will fulfil these duties by reducing, as far as is reasonably practicable, the risk of exposure to asbestos.
- 5.4. To this effect the Council shall put in place the following:
- 5.4.1. An AM-Plan that meets and goes beyond the minimum best practice requirements, presently L143 Approved Code of Practice to CAR 2012.
 - 5.4.2. The carrying out of surveys and management of asbestos risk in accordance with current legislation, guidance, and good practice. Namely, the Health and Safety Executive's Advisory Note on the refurbishment of housing stock likely to contain asbestos.
 - 5.4.3. A process for undertaking asbestos surveys of all buildings with a build date of pre-2000 that are deemed to contain asbestos within its structure, prior to commencing any planned and responsive repair works. Further details of asbestos survey will be covered in 7.1.1 below.
 - 5.4.4. A process for assessing and managing the risk from ACMs identified within our building stock.

² Legislation copies are available from HSE website - <https://www.hse.gov.uk/> or LBH Asbestos Management Team

- 5.4.5. A process for providing information about the presence, location, and condition of ACMs to employees and any other persons who are liable to disturb these materials. This includes contractors and where appropriate, residents and our employees.
- 5.4.6. A process for ensuring that appropriate control measures are undertaken by any persons who are likely to disturb these materials.
- 5.4.7. Asbestos awareness training for repairs and minor works operatives, so that they are able to identify any materials suspected of being ACM and to enable them to request an asbestos survey is undertaken before carrying out any intrusive work.
- 5.4.8. Assurance of Asbestos Awareness training, risk assessments and method statements (RAMS) for external contractors, in conjunction with the allocated Project Manager.
- 5.5. An Asbestos management team that will have the overall responsibility for the implementation and monitoring of the AM-Plan.
- 5.6. A process for the designation of actual day to day responsibilities to various personnel: the Corporate Asbestos Manager, the Building and Asbestos Officer and the Senior Engineer (Asbestos) within the Council as well as the Asbestos Manager and Supervisors within Lampton Services (LS)) and contractors (Asbestos Surveys, Air Testing and Asbestos removals and remedials. Details of such personnel are outlined within the AM-Plan.
- 5.7. A process for evidencing all contractors' adherence to the Council's AM-Plan, to cover the requirement set out in 5.4.8.

6. Duty Holder and Appointed Person

- 6.1. The Council's Chief Executive is the Duty Holder and has the overall responsibility and accountability for the management of ACMs within all Council housing owned and managed residential buildings and corporate properties, and to any property where the Council has a legal responsibility for maintenance and repairs. This includes the communal areas within such structures.
- 6.2. The Duty Holder has the responsibility for ensuring that a system is in place for the management of ACMs within Council owned and/or managed properties. This is where the Council has a responsibility for making sure that ACMs are kept safe and to ensure that they are unlikely to cause harm. Examples include schools and communal areas in Council housing owned residential blocks.
- 6.3. The Duty Holder has a responsibility to ensure that adequate resources are made available to enable personnel with the responsibility for managing asbestos, to introduce suitable and proportionate control measures. These will be to reduce the risk of exposure to ACMs to its lowest level, as far as reasonably practicable.
- 6.4. Appointed person/s for the delivery of asbestos management for housing and corporate has been delegated to the Director of Asset Strategy, Asset Management & Investment and the Head of Property Compliance.

6.5. The responsibility to cooperate in managing asbestos lies with all parties involved with a building or property where asbestos may be present, including contractors working on the site, building occupants, and anyone else who might disturb ACMs.

7. Management Arrangements

7.1. Asbestos surveys

- 7.1.1. The Council will use UKAS-accredited analytical company (consultant) for all surveys.
- 7.1.2. As detailed in 5.4.3, the Council is committed to undertaking asbestos surveys to all properties built prior to the year 2000 in line with CAR 2012. Also, to maintain an up-to-date register for all communal areas and carry out surveys to dwellings as and when access is available. Further details of tenant access, including the access through Housing Officers and the condition of the tenancy agreement to force access will be covered in AM-P.
- 7.1.3. The Council will undertake a full management survey to occupied properties when planned works or responsive repairs are undertaken and / or when access is available.
- 7.1.4. The Council is committed to undertaking asbestos condition surveys, also known as re-inspection surveys, in accordance with Regulation 4, CAR 2012. These allow the Duty Holder and those responsible for managing ACMs in premises, to monitor, carry out removal/remedial works and record the condition of any previously identified materials, within these buildings.
- 7.1.5. The Council will undertake Refurbishment or Demolition surveys, as and when required, before any intrusive works are undertaken to our buildings. This is done routinely for homes that are unoccupied (voids) and receiving preparation work, prior to reletting.
- 7.1.6. The Council will also undertake asbestos bulk sampling (sampling survey) when a suspected materials is identified or as and when needed in an emergency.

7.2. Asbestos Removals and Remedials

- 7.2.1. The Council is committed to using a HSE licenced contractor for all asbestos removal and remediation, to ensure asbestos is removed safely by competent professionals, and that the register is kept up to date.
- 7.2.2. The Council will ensure that all asbestos removal and remediation works are audited/quality checked before the relevant certificates (completion certificates, consignment waste note, Air test certificates or/and 4-stage clearance certificates³) can be approved on the asbestos register.

³ 4-stage clearance - A 4-stage clearance procedure follows the removal of licenced asbestos materials. The aim of clearances is to ensure the area is safe for re-occupation by members of the public. Stg 1 - Preliminary check of site condition, stg 2 - Thorough visual inspection inside the enclosure area, stg 3 - Air monitoring and stg 4 - Final assessment post-enclosure area dismantling.

7.3. Air Testing

- 7.3.1. The Council is committed to using a UKAS ⁴accredited independent air testing contractor to provide air tests, 4-stage clearance and reoccupation certificates to comply with Regulation 19 and 20 in CAR 2012.

7.4. The Asbestos Register

- 7.4.1. The asbestos register will be used as the primary tool for identifying, recording, and managing ACMs within our building stock.
- 7.4.2. The register will be used as a working tool and will allow the following:
 - 7.4.2.1. The Asbestos Management team to undertake annual desktop evaluations of the housing stock, to establish the probable asbestos status of properties. This in turn will drive the AM-Plan and assist all contractors working within our properties (including LS) who will be expected to use the data.
 - 7.4.2.2. Information about asbestos locations to be incorporated within the Health and Safety sections of asbestos reports and files, produced as a requirement of the Construction (Design and Management) Regulations 2015 (the CDM Regulations).
 - 7.4.2.3. An up-to-date asbestos register will be maintained. This will record how ACMs have been managed, encapsulated, and labelled or removed. It will also record the condition of ACMs and set up monitoring procedures as detailed above.
 - 7.4.2.4. The provision of information to building users, or residents in respect of any ACMs within their home or building. This will incorporate advice as to how asbestos should be managed.

7.5. Training Provision

- 7.5.1. The Council acknowledges that anyone working with asbestos or around ACMs will require clear instructions, guidance, and training provision.
- 7.5.2. The Council is committed to providing guidance and training, such as asbestos awareness training, to its operational employees.
- 7.5.3. The Council is committed to having a fully trained and competent asbestos management team to oversee and monitor all asbestos work involving surveys, removals, remediation, and the updating of the asbestos register. We will provide ongoing training for our employees in respect of their Continuous Professional Development (CPD).

⁴ UKAS - The United Kingdom Accreditation Service is the sole national accreditation body recognised by the British government to assess the competence of organisations that provide certification, testing, inspection, and calibration services.

7.6. Asbestos Management Plan (AM-Plan) Review

- 7.6.1. The purpose of the AM-Plan is to enable the effective management of ACMs that are presumed and identified in Council owned properties.
- 7.6.2. The Council will review its AM-Plan annually, pursuant to paragraph 143 of the Managing and Working with Asbestos Approved Code of Practice L143. This process will include incorporating any changes to the use of buildings, ACMs repaired or removed, including records and drawings.

7.7. Asbestos Management Policy (AM-Policy) Review

- 7.7.1. The AM-Policy will be reviewed annually to assess its adequacy and effectiveness. Also, to ensure that it remains compliant with the Council's legal duties for managing ACMs, as well as with the organisational structure in place to support its implementation.
- 7.7.2. The AM-Policy will be reviewed in the event of a major change in respect of the Council's governance structure and/or when there has been a significant change to the Appointed Person and Duty Holder's roles and responsibilities. Also, when there have been any changes to legislation or regulations applicable to asbestos.

7.8. Contacts

7.8.1. The Council's contacts (Housing):

- 7.8.1.1. Raj Vakesan, Senior Engineer (Asbestos and Fire Safety) | email: raj.vakesan@hounslow.gov.uk
- 7.8.1.2. Nick Knott, Building and Asbestos Officer (Asbestos and Fire Safety) | email: nicholas.knott@hounslow.gov.uk

7.8.2. The Council's Contact (Corporate):

- 7.8.2.1. Robin Francis, Corporate Manager | email: robin.francis@hounslow.gov.uk