



Title:	Asbestos Safety Policy
Person responsible:	Head of Assets & Building Safety
Customer consultation arrangement:	Consultation required? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If no, please explain why: Limited scope for customer input due to regulatory/legal framework
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Approved by:	Board
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Links to other key policies:	<ul style="list-style-type: none"> • Asset Management Strategy • Repairs and Maintenance Policy • Health & Safety Policy • No access procedures
Review date:	December 2028

Document management		
Version	Date amended	Amendments
1	March 2023	Previous version. Older versions available, contact Governance Team if further details required
2	Dec 2025	Reviewed in conjunction with specialist consultants. Updates include enhanced clarity regarding roles and responsibilities, requirements for contractor competency and greater emphasis on proactive communication with residents. Updates made to legislative references and regulatory standards.

1. Purpose

- 1.1 The purpose of this policy is to ensure South Lakes Housing (SLH) meets all applicable statutory obligations as a landlord and seeks to provide assurance that Asbestos is identified and managed, ensuring the safety of our residents, contractors, colleagues and the public.
- 1.2 SLH has a legal 'duty to manage' asbestos in its non-domestic buildings, including the common parts of its domestic blocks. This must be done in accordance with Regulation 4 of The Control of Asbestos Regulations (CAR) 2012

- 1.3 Therefore, this policy provides assurance that measures are in place to not only ensure compliance with the regulations, but that SLH has a robust asbestos management system (including asbestos register) in order to proactively identify, manage and mitigate risks associated with asbestos in both its domestic and non-domestic properties.
- 1.4 This policy is to be read in conjunction with the Asbestos Management Plan and its associated appendices. This plan will include guidance to support colleagues when allocating asbestos-related work.

2. Scope

- 2.1 This policy applies to all building, maintenance and installation activities within all properties owned or managed by SLH, including those that involve employees, contractors and sub-contractors. SLH recognise its responsibilities to contractors and others involved in building and maintenance projects and its duties as the 'Duty Holder' of buildings as defined by Regulation 4 of CAR2012.
- 2.2 SLH does not hold a landlord's duty of care in respect of asbestos in leaseholders' or shared ownership homes. The requirements of this policy apply to leasehold dwellings only as required to maintain safety of the block in respect to common areas.
- 2.3 For policy and safety purposes, it should always be assumed by all colleagues & contractors that any material to be worked upon within SLH homes (unless the property was constructed after year 2000 is an Asbestos Containing Material (ACM), unless there is suitable and sufficient evidence from the asbestos register to prove otherwise, or the material in question is a type that could not contain an asbestos product.
- 2.4 To adequately manage the risk posed by asbestos SLH will:
- Provide all resources deemed necessary by asbestos, including the appointment of a competent team.
 - Take reasonable steps to undertake assessments of all owned & controlled buildings and work together with any other nominated Duty Holders regarding asbestos.
 - Carry out asbestos management, refurbishment & demolition surveys and record the location and condition of known or suspected ACMs.
 - Ensure all findings of all asbestos assessments (surveys, samples, etc.) will be held in a central and accessible location (Keystone). This information will be updated regularly and all updates recorded.
 - Undertake all necessary steps to ensure asbestos information is made available to all parties who may be affected by the presence of ACMs and to ensure that anyone who may come into contact with known or suspected ACMs is made aware of the current information that may affect their activities.
 - Create and develop an Asbestos Management Plan which will be monitored, reviewed and revised regularly. This will state what steps will be taken to manage the risk from known or suspected ACMs
 - Undertaking regular training of managers and staff in line with their respective roles.
 - Develop, implement and monitor safe systems of work to protect the

safety, health and welfare of employees, residents and contractors.

- 2.5 In implementing this policy, SLH is committed to considering any vulnerabilities or specific needs of residents and their households, ensuring that all actions and decisions are made with sensitivity to individual circumstances.

3. Definitions

- 3.1 In this document, we refer to 'Residents' because it only affects people who live in the homes we provide and the landlord functions we deliver.

4. Regulatory and legislative Requirements

4.1 Regulatory Standards

The application of this policy will ensure compliance with the regulatory framework and consumer standards (Safety & Quality Standard) for social landlords in England, introduced by the Regulator of Social Housing (RSH).

4.2 Legislative

The principal legislation applicable to this policy is:

- Construction, Design and Management Regulations 2015
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Control of Asbestos Regulations (CAR) 2012
- Equality Act 2010
- Hazardous Waste (England & Wales) Regulations 2009.
- Housing Health and Safety Rating System (HHSRS) Regulations 2005
- Housing Act 2004
- Control of Substances Hazardous to Health (COSHH) Regulations 2002
- The Management of Health and Safety at Work Regulations 1999
- Personal Protective Equipment at Work Regulations 1992
- Environmental Protection Act 1990
- Control of Pollution Act 1974
- Health and Safety at Work etc. Act 1974

4.3 Code of Practice

The principal code of practice applicable to this policy is:

- HSE Approved Code of Practice (ACOP) L143 'Managing and working with asbestos'.

SLH acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice and failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and regulatory intervention and downgrade from the Regulator of Social Housing.

5. Our Approach

- 5.1 SLH will ensure that all asbestos management processes comply with CAR 2012 legislation and that an asbestos register is maintained on the Asset Management System, which details all status and risk profiles where Asbestos Containing Materials (ACM's) are located within an asset.
- 5.2 SLH will ensure that all non-domestic (communal blocks) and 'other' properties in ownership or management will have an asbestos management survey carried out as a minimum. All surveys will comply with the CAR 2012 legislation. They will have a re-inspection date assigned where applicable. This date will be in accordance with the specific needs and risks of the asbestos within the building type.
- 5.3 Communal areas (and other areas falling under CAR 2012) will be re-surveyed by the asbestos surveyor at the intervals (an absolute minimum) as listed on the Asbestos Register. If the condition through annual inspection changes, then the asbestos will be fully resurveyed to seek recommendations for any remedial actions and any revised survey intervals. The frequencies are determined by a full risk scoring profile undertaken by the asbestos surveyor and categorised from high to very low risk.
- 5.4 If conditions do not require an earlier assessment, all resurveys must be completed before the current survey expires.
- 5.5 The Asbestos register held in the Asset Management System will be updated accordingly with a new risk and condition score (plus photos) to demonstrate that the asbestos is being managed. Where there is a significant change of condition or circumstances in respect to building use, a new survey will be commissioned.
- 5.6 All Asbestos surveys will be carried out and documented in accordance with HSG264 - Asbestos: The Survey Guide all new surveys will be reviewed, and recommendations actioned accordingly.
- 5.7 For all domestic stock, SLH will review existing asbestos management survey information prior to carrying out any repairs or planned maintenance work which may involve working on or adjacent to any ACMs within a domestic property. This is to ensure that any ACMs likely to pose a risk are identified prior to work commencing and the details passed onto or identified by the relevant operatives or external contractors, so that these can be managed in an appropriate way.
- 5.8 Where there is no previous asbestos-related information in respect of a domestic property and the property was built pre-2000, an asbestos survey will be required before any works are undertaken. The scope of the survey will be agreed in accordance with the works due to be carried out (normally a Refurbishment and Demolition Survey).
- 5.9 If refurbishment works are to be undertaken, SLH will instruct an intrusive Refurbishment and Demolition (R&D) survey to domestic, non-domestic (communal blocks), and 'other' properties prior to any planned maintenance or major works commencing.
- 5.10 SLH will also undertake a management survey of the remainder of the property as part of the same survey, which is called an "enhanced survey", if this has not been previously completed (this is not a requirement of the CAR 2012 but is a policy principle adopted by SLH).
- 5.11 Where asbestos-containing or suspected asbestos-containing material is discovered during works that were not evident during the refurbishment & demolition survey, the

works will cease, and the emergency procedures shall be deployed and actioned (see reporting of non-compliance section) for further details.

6. No Access

- 6.1 SLH will take all reasonable steps to obtain access to properties in the management of asbestos.
- 6.2 In the event of exhausting all available options to secure access, we will carry out a risk assessment, taking account of the property and occupier and will seek to engage with residents to address any issues, considering any known or identified vulnerabilities, to facilitate access and ensure the well-being of the resident.
- 6.3 If we believe the integrity of the property, its fabric and/or the safety of the resident or those in the vicinity of the property is compromised. This may include, but is not limited to, obtaining an injunction for access, and any costs incurred would be recharged to the resident.

7. Protecting Residents

- 7.1 SLH will work with residents to raise awareness of building safety and the steps SLH will take to keep residents safe, including:
- Provide residents with relevant asbestos information about the risk of asbestos in the home via website, newsletters, leaflets and information at new tenancy sign-up.
 - Maintain a clear approach to gaining access to carry out surveys and undertake works and be clear that enforcement action may be taken when it is necessary to do so.
 - Provide asbestos survey reports upon request by the resident – if no survey is available, one will be commissioned.
 - If residents are affected by work involving the removal of asbestos, SLH will advise residents in writing ahead of the work being carried out and explain the implications and keep residents informed.
 - The above applies to both residents and leaseholders, though there may be a charge to leaseholders and Shared Ownership residents for commissioning an asbestos survey upon request, where no asbestos information is already available.
- 7.2 At all stages of this process, SLH will ensure residents understand asbestos safety, and if necessary, information will be translated or provided in large print.

8. Communication with other Stakeholders

- 8.1 Where there is a requirement or a request for asbestos information from other stakeholders such as the local fire authority, SLH will provide data from our asbestos register in the format required. SLH will consider giving the authority access to the portal on a “read only” basis if this is considered easier for the stakeholder.

9. Competent Persons

- 9.1 SLH will ensure that the colleagues responsible for operational delivery receive appropriate training to be able to manage the service.

- 9.2 SLH accepts that where both their own directly employed colleagues or contractors work in domestic properties, such places are workplaces and that all statutory provisions relating to work with asbestos-containing materials apply.
- 9.3 All colleagues, contractors and service providers undertaking works to properties on behalf of the client must understand how the policy, management plan and procedure are delivered operationally. They will also check and ensure that asbestos survey information is available prior to maintenance, refurbishment and demolition works, and that surveys are undertaken in accordance with HSG 264.
- 9.4 SLH will only allow the following to be undertaken by contractors that are able to demonstrate:
- Asbestos surveying competency (as per the Health and Safety Executive's publication HSG264) of Contractors & Consultants are procured and appointed to deliver asbestos surveys and remediation works. This will be for licensed and for notifiable non-licensed works.
 - Contractors undertaking non-licensed asbestos work will be 'vetted' to ensure that they have the required knowledge and training to conduct such an activity, to comply with CAR Regulation 10.
 - Removal of Asbestos – only correctly qualified and competent external contractors will be permitted to undertake the removal of licensed and non-licensed low-risk ACMs and or encapsulate ACMs within SLH properties.
 - Working with ACM's - appropriate Risk Assessments and Method Statements must be in place for the purposes of asbestos in relation to Construction Design and Management Regulations (CDM) 2015 requirements.
 - SLH will ensure that Asbestos Contractors and Surveying Consultants have in place the appropriate insurance to cover the activity they are scheduled to undertake.
- 9.5 SLH will ensure that any external contractors or consultants have the relevant and appropriate qualifications to carry out the assigned work and are competent. Licenses, governing body membership, training records and insurances of external contractors will be checked prior to commencement of any work.
- 9.6 For the avoidance of doubt, SLH internal trade operatives will not be permitted to work on any asbestos-containing materials.
- 9.7 Asbestos surveying consultants will be required to report formal documentation, such as asbestos surveys (both Managed and Enhanced) in an SLH format to enable data to be electronically ingested into the asbestos register. They will also be required to work through SLH portals directly to the Asbestos Register and upload validated asbestos survey data.
- 9.8 If a contractor cannot access the portal, then all asbestos records (including surveys) will be made available to that contractor in paper form or by other electronic means.

10. Colleague Training

- 10.1 There are three main types of information, instruction and training. These relate to;
- asbestos awareness

- non-licensable work with asbestos, including Notifiable Non-Licensed Work (NNLW)
 - licensable work with asbestos
- 10.2 SLH colleagues will have an ongoing understanding of asbestos through training, the understanding being appropriate to their roles and responsibilities.
- 10.3 SLH will ensure that the Asset Manager, with responsibility for management and delivery of Asbestos Surveys and removals, is appropriately qualified and or experienced in Asbestos Management. If a competent person does not have appropriate qualifications already, these should be obtained as soon as reasonably practicable, and second-line assurance provided from a competent person to provide sufficient oversight.
- 10.4 SLH colleagues with responsibility for managing asbestos will be required to attend duty to manage training to provide the relevant skills to develop, deliver and monitor an effective Asbestos Management Plan.
- 10.5 SLH will also ensure that all trade operatives working for the organisation's internal workforce receive asbestos awareness training annually at a minimum via e-learning module. Every second year, operatives will be required to attend in person asbestos awareness training.
- 10.6 Training for colleagues so they understand the required work, the nature of ACM present, and whether this is regarded as licensed or non-licensed.
- 10.7 Training so employees can properly assess RAMS to ensure they meet the requirements of CAR Regulations 6 and 7.
- 10.8 SLH will establish and maintain electronic records of all asbestos training undertaken by colleagues.

11. Responsibilities

- 11.1 SLH Board of Management will have overall governance responsibility for ensuring that effective arrangements are in place to comply with SLH's legal obligations in relation to the Asbestos Safety Policy and ensure this is fully implemented to provide compliance with regulatory standards, legislation, and approved codes of practice. As such, the Board will formally approve the policy and review it periodically.
- 11.2 The Board or its delegated committee will receive regular updates on the implementation of the Asbestos Management Plan, along with notification of any non-compliance issues identified. This is to provide assurance that the plan is operating effectively in practice.

12. Duty Holder/ Accountable Person

- 12.1 The Accountable Person under this policy will be South Lakes Housing. The Duty Holder is the Director of Homes who will delegate certain tasks to the responsible and competent persons.
- 12.2 The 'Duty Holder' is responsible for Health and Safety and must take the right precautions to reduce the risk of incidents/ accidents relating to Asbestos and ACM's

(They will appoint a person or persons to take day-to-day responsibility for controlling/assessing any identified risks, to prevent/control risks to colleagues and all stakeholders under their responsibility and ensure that the Asbestos Register is kept 'live' and ensure all remedial works are recorded correctly.

13. Responsible Persons

- 13.1 The Responsible Person(s) for SLH are the Head of Assets and Building Safety and the Asset Manager, who will ensure the implementation of the policy and procedures across SLH.
- 13.2 The responsible person(s) will ensure all operational procedures are carried out in a timely and effective manner. They will ensure all appointed organisations/individuals have the appropriate levels of training, skills, and knowledge to undertake the tasks and monitor training.

14 Other Teams

- 14.1 The Asset Management and Building Safety Teams will be responsible for commissioning surveys and remediation works, and assisting with other contractual duties in relation to asbestos.
- 14.2 All colleagues who have responsibility for visiting SLH properties have a responsibility to notify the Asset Management Team where circumstances have changed within a property which may result in an asbestos condition review being required.

15. Monitoring & Review

15.1 Records and Management of Data

- 15.1.1 SLH will hold accurate and up-to-date records against each property it owns and/or manages in an electronic Asbestos Register, identifying:
 - Where there are asbestos-containing materials (ACM's) present
 - The type of ACMs and risk priorities
 - The locations and date inspected
 - Inspection and re-inspection dates
 - Asbestos survey documentation
 - Removal and encapsulation certification
- 15.1.2 SLH will maintain the asbestos register and update it when properties are re-surveyed or remediated. Access to the asbestos register will be provided to stakeholders who are liable to disturb asbestos due to works they may be undertaking on behalf of SLH.
- 15.1.3 Asbestos data will be retained on the asbestos register for at least four years.
- 15.1.4 A log of contractor and in-house operatives accessing the asbestos database will be maintained to evidence its use.

15.2 Access/ Checking the Register

SLH will provide colleagues/contractors with access to the Asbestos Register via an internet-based portal. SLH will make the Asbestos Management Plan and Policy

available to all Contractors and Colleagues who must check the Asbestos Register and conduct an on-site risk assessment before carrying out any maintenance or building work, where there's a risk of asbestos being present and disturbed (Includes dwellings). SLH will carry out routine checks to verify the Asbestos Register is being used/checked.

15.3 Independent Audit Assurance

15.3.1 SLH will not permit cloning of asbestos surveys for its register. If a record is not available that shows a material has been tested and has asbestos not detected/detected, then it is to be assumed that asbestos is present unless it is a material that could not contain asbestos.

15.3.2 The Asset Manager will be responsible for carrying out random on-site checks to ensure that requirements within the policy and management plan are being adhered to.

15.3.3 Asbestos Management will be reviewed as part of SLH Internal audit programme.

15.4 Review

This policy will be reviewed every 3 years, or sooner if required by statutory, regulatory changes, or to incorporate best practice. In addition, SLH will ensure that the policy is reviewed and, if necessary, amended, following any significant event or issue such as:

- Independent audit highlighting failings in process or policy.
- Where any person(s) has been exposed to the release of asbestos fibres at a property owned or managed by SLH.
- Any significant changes to the building.
- Required following an independent asbestos audit on samples, and with the result that surveys need to be reviewed by another competent assessor/surveyor.
- Where the management plan is deemed to be unsuitable, or limitations are identified to suggest that the control measures are insufficient.
- Change in business risk appetite.

15.5 KPI's

Key Performance Indicators will support the Asbestos Policy and will be reported monthly to the Senior Leadership Team and quarterly to SLH Board of Management.

16. Reporting of non-compliance

16.1 Any non-compliance issue identified at an operational level will be formally reported to the Head of Assets and Building Safety and the Asset Manager in the first instance, and will agree an appropriate course of corrective action with the operational team to address the non-compliance issue and report details of the same to the Senior Leadership Team.

16.2 The Senior Leadership Team will ensure the Board and Audit & Risk Committee are made aware of any non-compliance issues so they can consider the implications and act appropriately.

16.3 The Senior Leadership Team and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation as part of the Regulatory Framework.

- 16.4 Where there is a release of asbestos fibres, emergency procedures will be invoked, and a HSE RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) report will be issued as appropriate.