



Broxtowe
Borough
COUNCIL

Asbestos Policy 2025

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Summary

This Policy outlines Broxtowe Borough Council's approach to the management of asbestos within our properties to ensure the safety of tenants, commercial lease holders, our employees and make sure that all statutory obligations are met and to protect people from harm.

Broxtowe Borough Council (BBC) acknowledges and accepts its responsibilities under the Health and Safety at Work etc. Act 1974, and the Control of Asbestos Regulations (CAR) 2012 to identify and safely manage Asbestos Containing Materials (ACMs) on its premises. Approved Codes of Practice and guidance information published by the Health and Safety Executive shall be taken as the adopted standard. Relevant primary guidance is listed under section 7 of this Policy.

Policy Statement

Broxtowe Borough Council (BBC) recognises and accepts the duty of care placed upon it under the Health and Safety at Work etc. Act 1974 and associated Regulations, as well as their moral responsibility to maintain, manage, and operate the buildings under their control, with all reasonable and practicable measures to prevent the risk of exposure to Asbestos Containing Materials (ACMs) by employees, contractors, visitors, tenants, and members of the public as a result of their operations.

BBC understands and is committed to its 'duty to manage' asbestos within all its premises, as required under Regulation 4 of Control of Asbestos Regulations 2012. Under Regulation 4 BBC is obligated to identify and record the location and condition of all asbestos containing materials (ACMs) and manage and monitor the related risks.

BBC will make every reasonable effort to identify, manage and monitor all ACMs within their properties ultimately preventing or reducing exposure to asbestos, as far as is reasonably practicable, to all persons visiting, working, or living within its properties.

These principles will apply to all properties owned or leased by BBC.

These principles will apply to all employees who may be exposed to asbestos through their work activities.

Signed on behalf of Broxtowe Borough Council

Ruth Hyde
Chief Executive Officer

Date:

1.0 Review

This Policy will be reviewed every three years or sooner when there has been an update to legislation, regulation, approved codes of practice or operational changes within BBC. The next planned update will be in November 2027.

2.0 Policy Aims

This Policy aims to outline the main principles of asbestos management providing a framework of procedures to comply with the Control of Asbestos Regulations (CAR) 2012. Ensuring that existing ACMs in BBC properties are managed safely throughout their useful life, and when necessary are encapsulated or suitably removed and disposed of.

- provide clear lines of responsibility within BBC for the management of asbestos.
- specify individual responsibilities in the management of asbestos.
- provide a commitment to communication with tenants and all persons who may be at risk of exposure to asbestos.
- make clear BBC's approach to surveying properties.
- set out the framework for managing asbestos.

3.0 Scope

This Policy outlines BBC's approach to the management of asbestos within its properties to ensure the safety of tenants, commercial lease holders, our employees, and contractors to make sure that all statutory obligations are met.

The Policy covers all council Housing Revenue Account (HRA) assets, including dwellings, common parts of blocks of flats and independent living schemes, garages, and other assets where we have a repair and maintenance responsibility.

BBC will make every reasonable effort to identify, manage and monitor all ACMs within its property portfolio, including but not limited to operational buildings e.g. offices, leisure facilities, green spaces, transport depot and workshops and its property portfolio and which includes:

Social Housing Properties

- Houses
- Blocks of Flats
- Maisonettes
- Bungalows
- Independent living schemes
- Community rooms
- Garages

Corporate Properties

- Office buildings
- Leisure centres
- Museums (where owned by Broxtowe Borough Council)
- Pavilions (where owned by Broxtowe Borough Council)
- Stores/Depots

Commercial Properties

- Retail Units
- Cinema Complex
- Business Outlets

In addition to the above, BBC has a duty to safely remove asbestos found in the community as a result of fly tipping. To ensure the safety of members of the public, Environment Services will arrange for the safe collection and disposal of any ACMs found in a public space.

BBC will investigate concerns relating to asbestos where they have a relevant enforcement responsibility and will take appropriate action should damaged ACMs be identified in these cases. This may include enforcement action under the Housing Act 2004, The Environmental Protection Act 1990, or the Health and Safety at Work etc. Act 1974.

Any reference in this Policy to 'we', 'our' or 'us' refers to Broxtowe Borough Council (BBC).

Any reference in this Policy to 'tenant', 'customer' or 'resident' refers to a Broxtowe Borough Council Local Authority Housing secure tenant, leaseholder, or shared owner.

This Policy is designed to work alongside our wider set of health, safety, and compliance policies, processes, and safe systems of work (SSOW).

4.0 Purpose

This Asbestos Policy is designed to provide a clear acknowledgement of the responsibilities that BBC has in relation to the management of ACMs and its approach to the management of ACMs within the properties it has responsibility for to ensure that: -

- It meets its statutory and legislative obligations under health and safety legislation, specifically The Control of Asbestos at Work Regulations 2012.
- Effectively manage all Asbestos Containing Materials (ACMs) across the property portfolio and to reduce the asbestos related risks to as low a level as is reasonably practicable, this includes disseminating appropriate information to anyone who may disturb asbestos containing materials within a BBC property, either deliberately or accidentally.

- Establish clear guidelines to be adopted whenever asbestos is encountered in premises owned by or occupied by BBC or in public and green spaces that are maintained by BBC.
- Asbestos will not be removed where, following detailed assessment, it is proved to be in a non-hazardous condition and will not be damaged or otherwise exposed, nor will it affect future maintenance plans or activities.
- Compile and maintain information on ACMs including an asbestos register for all BBC properties owned, managed, or maintained by BBC that specifies the location, type, and condition of the ACMs within each of its properties.
- Implement an effective and positive asbestos management strategy, based on risk assessment, to ensure that all ACMs will be:
 - maintained in an encapsulated and safe condition; or isolated; or removed in accordance with on-going maintenance works.
 - appoint suitably qualified employees to oversee the management of ACMs.
 - consult the appropriate register prior to any building maintenance, refurbishment, construction, demolition, or other works likely to disturb asbestos within its premises.
 - The General Management Team (GMT) will ensure there are sufficient resources that can be used effectively to manage ACMs, in a planned and strategic manner.
 - freely provide information, instruction, supervision, and training to all those who need it on ACMs.
 - promote awareness of asbestos and BBC's Asbestos Management Plan (AMP).
 - maintain the momentum in the development of expertise and best practice.
 - regularly review the Asbestos Management Register and make amendments where necessary.

5.0 Terms and Definitions

Asbestos is a fibrous mineral which is mechanically strong and highly resistant to heat and chemical attack. Because of its fibrous nature, it can be woven into fabrics and used as reinforcement for cement and plastics. In the past, its versatility made asbestos a popular building material. It was used in a multitude of different ways including flooring, roofing, and thermal insulation because of its properties of fire, acid, and electrical resistance.

ACM	Asbestos Containing Material
ACOP	Approved Code of Practice
AMP	Asbestos Management Plan
ARCA	Asbestos Removal Contractors Association
BBC	Broxtowe Borough Council
BOHS	British Occupational Hygiene Society
CAR	Control of Asbestos Regulations (2012)
Contractor	This generally refers to Principal Contractors, Sub-Contractors and single contractors working on Council properties
GMT	Council's General Management Team
HSE	Health and Safety Executive
LARC	Licensed Asbestos Removal Contractor
PEL	Permissible Exposure Limit
RA	Risk Assessment (relative risk including task/material/frequency)
RAMS	Risk Assessment and Method Statement
RSPH	Royal Society for Public Health UKATA United Kingdom Asbestos Training Association
SSOW	Safe System of Work
TWA	Time Weighted Average
UKAS	United Kingdom Accreditation Service

6.0 Health Effects

The presence of an ACM 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.

Individuals considered to be most at risk from asbestos are those involved in building renovation and maintenance work, such as plasterers, plumbers, gas fitters, carpenters, and electricians. Inadvertent exposure and consequent risk can occur in other groups of people e.g. installers of burglar alarms, smoke detectors, fire alarm systems etc... it is important, therefore, to have in place a management system which minimises the potential for exposure to asbestos.

The Permissible Exposure Limit (PEL) for asbestos is 0.1 fibre per cubic centimetre of air as an eight-hour time-weighted average (TWA), with an excursion limit (EL) of 1.0 asbestos fibres per cubic centimetre over a 30-minute period. BBC will ensure that no one is exposed above these limits.

Anyone disturbing ACMs must report it immediately to their line manager and contact their General Practitioner. Disturbing ACMs is a Dangerous Occurrence under RIDDOR. All Dangerous Occurrences must be reported to the Health and Safety Executive (HSE) under schedule 2(10) of RIDDOR within the statutory reporting period of 10 working days from the date of the exposure.

7.0 Legislation and Regulation

The primary legislation is the Health and Safety at Work etc. Act 1974 which imposes a general duty of care on BBC.

Under the Housing Health and Safety Rating System (HHSRS), Housing Act 2004 Part 1 BBC will inspect each property to check if there are one or more of the 29 hazards and decide on remedial work to be done to reduce risks as low as reasonably practicable. All BBC properties should be free of Category 1 Hazards. Category 1 Hazards relate to serious and immediate risk to a person's health and safety, which include ACMs.

Private sector rented tenants can report concerns to be investigated.

In commercial premises, BBC will investigate concerns relating to asbestos where they have a relevant enforcement responsibility and will take appropriate action should damaged asbestos be identified in these cases. In the case of notification of asbestos work in such premises, an assessment will be made in respect of any further action required.

The specific regulations to comply with the management of Asbestos in the UK are:

The Control of Asbestos Regulations 2012 (CAR 2012) which make specific the duty to manage asbestos. It relates to nondomestic premises, workplaces and common parts of flats and other communal areas. Regulation 7 of the Health and Safety Executive's Approved Code of Practice L143 stipulates that all ACMs are removed as far as is reasonably practicable prior to any major refurbishment or demolition work.

Other legislation and regulations which are applicable to this Policy include but may not be limited to:

The Asbestos (Licensing) Regulation 1983 which prohibits work with asbestos, insulation or coating of greater than 2 hours' duration without a licence issued by the Health and Safety Executive (HSE).

The Management of Health and Safety at Work Regulations 1992 which require employers to assess the risks to the health and safety of employees and others at work.

The Construction (Design and Management) Regulations 2015 which generally place greater responsibility on the client. BBC will appoint a Principal Designer (where appropriate) and a principal contractor following an assessment of competency and resources and must ensure adequate plans and welfare are in place before construction begins. It is a legal requirement to remove asbestos containing materials (ACMs) prior to any refurbishment or demolition work.

The Hazardous Waste (England and Wales) Regulations 2005 and the Hazardous Waste Regulations (England and Wales) (Amendment) Regulations 2016 aim to ensure that hazardous wastes are properly managed from their production to their final destination.

The Workplace (Health, Safety and Welfare) Regulations 1992 require employers to maintain workplace buildings so as to protect occupants and workers.

Control of Substances Hazardous to Health Regulations 2002 and the Control of Substances Hazardous to Health (Amendment) Regulations 2004 require employers to prevent or control worker exposure to harmful substances using effective risk management and good control practices for hazardous substances.

The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations requires that exposure to asbestos is reported when a work activity causes the accidental release or escape of asbestos fibres into the air in a quantity sufficient to cause damage to the health of any person.

The Housing Act 2004 Introduced the Housing Health and Safety Rating System (HHSRS) a risk-based approach to assessing housing conditions. Asbestos is considered a hazard under this system due to its potential to cause serious health issues.

Landlord and Tenant Act 1985 Landlords must ensure the property, including its structure, is safe and habitable.

Homes (Fitness for Human Habitation) Act 2018 requires rental properties to be fit for habitation, including being free from serious hazards like asbestos.

Environmental Protection Act 1990 Where damaged asbestos is identified on private land, BBC will investigate and will take appropriate action in accordance with levels of risk and the Council's enforcement Policy. Employees and Contractors must ensure that ACM waste is removed and transported safely and disposed of at licensed premises. Asbestos waste is classified as hazardous waste under this Act. A duty of care applies to all persons involved in generating, transporting, and disposing of asbestos waste.

The Environmental Permitting (England & Wales) Regulations 2016 streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment.

The Personal Protective Equipment at Work Regulations 1992 PPE must be worn when working with asbestos containing materials in order to protect the wearer from exposure to harmful asbestos fibres.

This Policy is based on the aforementioned Legislation and Regulation and the approved codes of practice and guidance published by the Health and Safety Executive (HSE). Including: -

L143	Managing and working with asbestos
L25	Personal protective equipment at work
HSG 264	Asbestos: The survey guide
HSG 227	A comprehensive guide to Managing Asbestos in Premises
HSG 210	Asbestos essentials for building, maintenance & allied trades on non-licensed asbestos work
HSG247	Asbestos: The licensed contractors' guide
HSG248	Asbestos: The analysts' guide for sampling, analysis & clearance procedures
HSG53	Respiratory protective equipment at work: A practical guide

These approved codes of practice and guidance must be used in conjunction with this Policy and must be complied with in their entirety.

8.0 Level of Risk

BBC is committed to ensuring that all asbestos and asbestos containing Materials present within all buildings owned, managed, or maintained by BBC are properly managed and controlled so that they will not present a risk to employees, tenants, contractors, or members of the public.

Any **employee, administrator, contractor, or sub-contractor to BBC found** to be deliberately contravening this Policy will be subject to disciplinary action and, where appropriate, legal action by the HSE and or the HHSRS Enforcement Team.

9.0 Responsibilities and Duty Holders

As a Duty Holder, BBC has responsibility as outlined in Regulation 4 of the Control of Asbestos at Work Regulations 2012. Under Regulation 4, BBC is obliged to identify and record the location and condition of all ACMs and manage and monitor the related risks.

9.1 The Chief Executive Officer (CEO) of BBC as the duty holder has ultimate responsibility for ensuring compliance with this Policy.

The Duty Holder will ensure that:

- Adequate resources are allocated to allow effective management of ACMs within the Council properties, housing stock, the private rented sector, and commercial organisations where BBC have enforcement powers.
- Reasonable steps are taken to identify ACMs within council owned/leased properties likely to contain asbestos and check their condition.
- A written record of the location of ACMs is maintained and made available to any party liable to disturb it.
- Materials are presumed to contain asbestos unless there is strong evidence to suggest they do not.
- Control measures are implemented to manage and monitor ACMs to prevent asbestos fibre release.
- Only competent persons undertake work on asbestos.
- All work on ACMs is planned, monitored, and communicated to interested parties.

- Suitable and sufficient emergency arrangements are in place to deal with unplanned release of asbestos fibres.

In order for the CEO to discharge these duties, it will be necessary for the CEO to delegate the day-to-day accountability to others.

The CEO will ensure that Directors and Heads of Service are provided with all necessary resources to ensure that they are able, within their own Directorates / Service Areas, to comply with their duties to meet the objectives of this document and their specific responsibilities. Having ensured that all necessary resources have been provided, the CEO will ensure that the Directors and Heads of Service comply with their duty to ensure the safe management of asbestos within their Directorate and will hold them accountable to do so.

The following roles have been appointed by the Duty Holder as 'Responsible Persons' to assist in the day-to-day management of ACMs.

9.2 Directors will ensure the implementation of this Policy and all supporting procedures, SSOW and processes across the Directorate they manage.

9.3 Heads of Service will make all employees, contractors and other third parties aware of all known locations and condition of ACMs and ensure that information, instruction, supervision, and training is provided to all employees within their control. In addition, but not limited to the aforementioned requirements the nominated HoS roles have the following responsibility within their area of control.

9.4 Head of Asset Management and Development, Head of Housing and Head of Planning and Economic Development

- Ensure that a suitable and sufficient assessment is undertaken to determine whether ACMs are present or not.
- Where ACMs are confirmed or presumed to be present in the premises a determination of the risk from that ACM is made and recorded.
- A written Asbestos Management Plan (AMP) identifying those parts of the property believed to contain ACMs is prepared and maintained.
- The control measures which are to be taken for managing the risk of exposure are detailed in the AMP.
- The AMP must include adequate measures for monitoring the condition of any ACMs or any substance containing or suspected of containing asbestos.
- Ensuring that all locations within our premises that contain asbestos are suitably marked, their condition monitored and recorded by way of annual inspection and all relevant information is made available to contractors and sub-contractors.

- Ensuring any ACMs or any such substance containing or suspected of containing asbestos is properly maintained by way of encapsulation or where it is damaged it is safely removed.
- Ensuring that information about the location and condition of any ACMs or any such material containing or suspected of containing asbestos is provided to every person liable to disturb it and made available to the emergency services.
- The AMP is reviewed and revised at regular intervals and without delay if there is reason to suspect that the AMP is no longer valid, or there has been a significant change in the premises to which the plan relates.
- The measures specified in the plan are implemented, recorded, and reviewed.
- Any exposure to ACMs must be reported as a Dangerous Occurrence to the Head of Health, Safety, Compliance and Emergency Planning.
- Ensure that any works are undertaken in accordance with an approved safe system of work.
- Ensure the planning of work includes a check of the existing asbestos survey information.
- Ensure all consultants and contractors undertaking work with ACM are competent to do so.
- Ensure that asbestos safety is not compromised.
- Co-ordinate project information with relevant contractors in sufficient time to enable appropriate asbestos surveys to be undertaken, if required, at the planning stage
- Ensure that all contractors falling under their supervision have received suitable information, instruction, and training to allow the works to be done safely.
- Ensure that no work which could result in the release of asbestos fibres is allowed to proceed until appropriate asbestos information is in place.
- Ensure that all asbestos surveys, encapsulation, removal, and the results of air monitoring are stored on Capita.
- Advise Duty Holders and Responsible persons as soon as possible of any issues that may arise with regards to asbestos management.
- Ensure that all work relating to asbestos is monitored and completed as appropriate. i.e. asbestos clearance, air monitoring, four stage clearance certificate, reoccupation letter.
- Maintain and update the Asbestos Register.

9.5 Contractors

All contractors will be appointed by the Head of Asset Management and Development in accordance with the wider procurement rules pertaining to BBC. Any and all Project work that arises from UKSPF managed by the Head of Planning and Economic Development that impacts on CDM regulations will be notified to the Head of Asset Management and Development and the Head of Health, Safety, Compliance and Emergency Planning so that the Asbestos risk can be appropriately managed.

The contractor that is appointed must be able to demonstrate their competency with regards to working with ACMs. This includes ACM encapsulation, removal, testing, surveying, and air clearance.

When working with BBC on all projects contractors must.

- Plan, manage and monitor their own work.
- Demonstrate the competency of their workers with relevant certification.
- Train their employees to the required standards.
- Be competent and have the relevant UKAS accreditation.
 - ISO 17020 Asbestos Surveying
 - (RSPH) Level 3 Award
 - BOHS P402 Certification (Building Surveys and Bulk Sampling for Asbestos)
 - BOHS P405 Certification (Management of Asbestos in Buildings)
 - UKATA
- Comply with the requirements of CDM Regulations
- Appoint competent sub-contractors.
- Use only licensed waste transfer/removal specialists registered on the Environment Agency (EA) public register.

Where works are notifiable under the CDM the Head of Asset Management and Development, Head of Housing and the Head of Planning and Economic Development must ensure that competent contractors are appointed and that they are aware of their duties and where appropriate the HSE notified. All contractors engaging in notifiable work must be listed in the 'Asbestos Licence Holders Register' with UKATA.

9.6 Head of Environmental Health, Licensing & Private Sector Housing will support this Policy and identify employees who require training in asbestos awareness and the investigation and procedures to take if they identify it in poor condition in premises we are visiting or in private properties and the associated enforcement options. If identification is required, this will be undertaken by a relevant UKAS accredited contractor.

9.7 The Head of Health, Safety, Compliance and Emergency Planning will support this Policy and provide assurance to GMT and the Council Members of the effectiveness of its arrangements and will monitor the implementation of and compliance with this Policy, along with asbestos survey performance indicators, and any significant issues arising.

9.8 The Housing Compliance Manager, Modernisations Manager and Capital Works Manager will work with operational teams to maintain robust procedures to deliver these Policy requirements.

10.0 Information, Instruction, Supervision and Training

BBC employees and contractors engaged in the use, maintenance, or management of owned, managed or maintained premises, or employees who may come into contact with ACMs as part of their work duties must be able to recognise ACMs and know what to do should they come across ACMs to protect themselves and others. BBC insist that as a minimum these individuals must have attended an Asbestos Awareness Course so that they can work safely and competently without the risk to themselves or others.

There are three main levels of information, instruction, and training. These relate to:

- Asbestos awareness
- Non-licensable work with asbestos including Non-Notifiable Licensed Work (NNLW)
- Licensable work with asbestos.

BBC will identify what level of training will be appropriate for each role within the Council through the use of a Training Needs Analysis and determine what topics should be covered to ensure that employees have the right level of competence to avoid putting themselves or others at risk. Repairs operatives, caretakers and any other employees who may potentially be exposed to asbestos when undertaking their normal duties will also be evaluated periodically and sufficient training implemented to suit any additional training deemed necessary.

BBC will ensure that all training satisfies the requirements of Regulation 10 of the Control of Asbestos Regulations 2012 and the supporting Approved Code of Practice L143 'Managing and working with asbestos'.

BBC require that any employee or contractor who plans to carry out work that will disturb asbestos require a higher level of information, instruction, and training, in addition to asbestos awareness. This should take account of whether the work is non-licensed; notifiable non-licensed work (NNLW); or licensed work and should be job specific.

Examples of Notifiable non-licensed work (NNLW) is:

- drilling holes in asbestos materials (including for sampling and analysis purposes)
- laying cables in areas containing undamaged asbestos materials
- removing asbestos-containing floor tiles
- cleaning or repairing asbestos cement sheet roofing or cladding.

Before such work is undertaken BBC require that all employees and contractors engaged in the activity are furnished with the risk assessment for the work, the method statement outlining the plan of work and where applicable the details and results of any air monitoring.

For Licensable work with Asbestos, BBC will instruct and appoint a licensed contractor who is accredited through UKATA and will ensure that details of the

notification of work has been made to the enforcing authority, the HSE by way of an F10 Notification.

11.0 Management of Asbestos

Asbestos in situ poses little risk and should only be treated or removed if its condition deteriorates or remedial / renovation works are required. The key to successful management of asbestos is to identify locations and forms of asbestos, monitor its condition and take the appropriate remedial action as and when required.

No new ACMs will be used in Council owned premises, this has been a legal requirement since 2000.

Where existing installations include ACMs, which is sound in good condition, not yet subject to abrasion or deterioration the materials will be left undisturbed, and its condition monitored and assessed annually.

Existing installations containing ACMs that are damaged, deteriorating, or inadequately sealed will either be removed and replaced by suitable material not containing ACMs, or encapsulated, whichever is the most practical and positive way to prevent the release of ACM fibres.

ACMs likely to be disturbed by maintenance or other works will be labelled clearly.

BBC owned properties will initially be surveyed for Asbestos by external consultants.

The completed surveys will form the basis of an effective AMP, the objectives of which are as follows:

- To maintain a register of the nature, position and extent of ACM based materials within all premises and update it as and when necessary.
- To effectively control the risk associated with ACMs in premises where building users, contractors, members of the public and employees are liable to be exposed.
- To use the AMP and Asbestos register to actively advise customers, contractors, and employees of the location of ACMs in premises, to enable them to take the necessary precautions to ensure their safety. A list of examples follows; however, this list is not exhaustive.
 - Building users, customers, employees etc.
 - Contractors working in or adjacent to the building (through the works order system or by Asbestos awareness clauses in contract documentation).
 - Maintenance personnel required to prevent deterioration of existing Asbestos On-site.
 - New employees.
 - Customers, existing and new.
 - The Health and Safety Executive.
 - The Planning Supervisor where CDM is involved.

Surveys will be conducted on both void and occupied properties. All information collected will be shared via the online portal One Housing System to maximise effectiveness.

Where Council employees are directly involved in ACM inspections a system for health surveillance will be put into place. Similarly, procedures for monitoring the health of any person who has been exposed to asbestos fibres above the action levels detailed in the CAR 2012 will be established.

Health Surveillance Records must be kept for a period of 40 years after the last entry. These records must be kept secure and accessible by the Human Resources Manager and comply with the wider data retention Policy.

11.1 Types of Asbestos

Asbestos is a naturally occurring mineral and products containing asbestos have been used for many years in a whole range of applications and locations including industrial, commercial, and domestic premises. It has typically been used for thermal and sound insulation, fire protection or as a component of structural finishes, such as in walls and ceilings. The three types of asbestos most commonly used are:

- Amosite (Brown)
- Crocidolite (Blue)
- Chrysotile (White)

In many cases the presence of asbestos is not known until it is exposed through wear, through structural damage or during development work. Whilst the use of all forms of asbestos has been banned in the UK since 1999, a great deal of asbestos is still in situ from previous installations dating back to the 1870s. Therefore, any premises built before 2000 may have ACMs present.

11.2 Third Party Competency

Where asbestos in one or more premises is to be managed by third parties under a lease agreement, demonstration of competency must be sought by BBC prior to making this agreement.

Third party competency may be demonstrated in the any of the following ways:

- The leaseholder can supply training documentation in line with their level of control over premises maintenance.
- Where the leaseholder does not hold the requisite level of qualification, confirmation that a competent UKAS accredited specialist will be engaged to undertake a survey and provide technical advice to the duty holder.
- Where the leaseholder does not hold the requisite level of qualification, arrangements are made for the leaseholder to make use of BBC's approved contracted asbestos specialist and costs recharged to the leaseholder as appropriate.

11.3 Asbestos Management Plan

BBC are committed to the development and implementation of an Asbestos Management Plan (AMP) within the next three years for our housing stock and operational premises that will:

Develop and maintain an electronic register of the location and condition of all ACMs found in the properties owned and directly managed by us identified in the 2024/25 survey reports.	Year 1
Following receipt and evaluation of all information within the 2024/25 survey reports, ACM management will be prioritised, and relevant actions shall be initiated and completed within the recommended timescales and priority rating.	Year 1 - 2
Comply with all relevant asbestos legislation to assist us with our duty to manage in accordance with Regulation 4 of the Control of Asbestos Regulations 2012 (CAR 2012). This will be assisted by compliance with regulations, 5, 6 & 10.	Year 1 - 3
Presume that materials contain asbestos unless strong evidence is available to suggest that they do not.	Year 1,2,3
Undertake a programme of asbestos management surveys and re-inspect positive findings in non-domestic premises, including common parts in domestic blocks, on a regular basis.	Year 2 - 3
Manage known ACMs in line with the findings of surveys and assessment of the likelihood of anyone being exposed to asbestos fibres.	Year 3

Grade	Type	Priority	Inspection Period
A	Notifiable/friable materials and materials that have been scored for both the material and priority assessments at 12 or higher	medium to high risk	Re-inspect annually (or sooner)
B	Non-notifiable/low friable materials that have been identified and are scored for both the material and priority assessments at 11 or less	low/very low risks	Re-inspect 2 yearly (or sooner)
C	Presumed materials that are inaccessible (in compliance with regulation 6).	undertake a risk assessment to identify the risks of exposure to asbestos.	Desktop review 3 yearly (or sooner).
D	Premises with no ACMs identified or presumed.	No risk	no further action required.

We operate a risk-based approach to the management of known ACMs. The two elements that inform the risk are:

- Condition of the ACM, e.g. damaged vs. undamaged
- Location of the ACM, e.g. likelihood of disturbance

11.4 Asbestos Surveys

The surveying and regular review of non-domestic properties, including common parts of domestic properties. Examples of common parts include foyers, corridors, lifts and lift shafts, staircases, plant rooms, common roof voids/roofing, service risers, gardens, yards.

An asbestos management survey is designed to identify any ACMs that may be present in a building that is in normal use. BBC will ensure that this is completed so that as the owner / duty holder BBC can safely manage any asbestos present and prevent exposure to building occupiers and maintenance employees.

There are 3 main types of survey:

11.4.1. Management Surveys

These are undertaken to determine if asbestos is present within a building and, subsequently, allows the duty holder, BBC to manage the asbestos in compliance with Regulation 4 of the Control of Asbestos Regulations, (Duty to Manage).

11.4.2. Refurbishment and Demolition Surveys

These surveys are undertaken prior to any proposed Refurbishment or Demolition work. They are more intrusive than Management Surveys and are designed to detect asbestos within the building that might possibly be disturbed as a result of the proposed Refurbishment or Demolition Works.

11.4.3. Re-inspection Surveys

Re Inspection or Condition Surveys are undertaken on a regular basis to known Asbestos containing materials within a building to check and report upon their condition. This ensures that if the materials have deteriorated and present a greater hazard remedial action can be taken to mitigate the change in circumstances.

Surveys are undertaken, on behalf of BBC must follow the Health and Safety Executive Guidance HSG264 the Surveying Guide, by fully trained and experienced surveyors holding a Royal Society for Public Health (RSPH) Level 3 Award in Asbestos Surveying or a British Occupational Hygiene Society qualification BOHS P402 as a minimum authorised by a company holding ISO 17020 Asbestos Surveying Accreditation.

Asset Management and Capital Work Streams, including Economic Development and Regeneration will ensure that the appropriate Asbestos survey is undertaken for the task at hand and that a refurbishment and demolition survey is undertaken prior to the commencement of all intrusive building/development works to identify the location and condition of any material that might contain asbestos.

A management survey may be undertaken for terms of management only when no planned works are known and must not be used for the purposes of planned refurbishment/intrusive works.

For a management survey (and refurbishment and demolition surveys where the work is not imminent), the following additional information will be provided:

- Accessibility of the ACM
- Amount of damage or deterioration
- Surface treatment (if any)
- The material assessment score or category
- Any actions required from the material/priority assessments.

When ACMs are identified during a survey, a site-specific risk assessment of the individual material will be completed and included in the survey report. The survey results will include a summary table with the following information:

- Location of the ACMs
- Extent of the ACMs
- Product type
- Level of identification of the ACM
- Asbestos type in the ACM

Findings from assessments will be recorded in the Asbestos register and where necessary, control and management actions will be taken to manage, remove or treat ACMs to eliminate or minimise risk of exposure to airborne asbestos fibres.

It is our Policy that all works with identified ACMs must be undertaken by an appointed licenced asbestos removal contractor.

11.5 Asbestos Register

The Asbestos Register will be regularly updated from information gathered from the surveys. Information will be stored on a computer database and all entries will be accompanied by a suitable location plan.

Information contained in the Asbestos Register will be available to Council employees, which in turn will ensure that all necessary information is brought to the attention of all contractors prior to the commencement of any building related works. Where remedial measures are necessary for dealing with Asbestos material, the consultant or contractor employed by the Council must comply with all the relevant current legislation. Such remedial measures will be recorded, and the Asbestos register updated accordingly.

11.6 Monitoring and Continuous Improvement

All ACMs left in situ in BBC premises will be re-inspected by appointed third party contractors commissioned to complete Asbestos Surveyors on a priority basis on behalf of BBC following previous grading unless otherwise determined by risk assessment and detailed in the Asbestos Register.

Information collated during these inspections will be used to update the Asbestos Register, and appropriate action taken regarding any recommendations made. The identified ACMs will form part of future inspection.

The AMP will be monitored and reviewed during auditing and testing activity.

Health and safety auditing arrangements are in place, which include compliance with this Policy and associated procedures. Audits and reviews provide data reflecting the effectiveness of this Policy and identify opportunities to achieve continual improvement in the management of asbestos across BBCs housing portfolio and within its operational and commercial buildings.

11.7 Record Keeping

BBC will keep a record of the information, instruction, and training given to all employees and we expect that our contractors and sub-contractors will share details of training for their employees who are engaged in work on our premises where they may encounter ACMs.

The risk associated with asbestos will be recorded and assessed through the risk register.

11.7.1 ACM Treatment based on condition and location

1.	Undamaged and unlikely to be damaged	leave ACM in place and monitor
2.	Good condition and not readily accessible	seal ACM
3.	Slightly damaged and not readily accessible	repair and seal ACM.
4.	Any other condition or location	remove by appropriately licensed and approved ACM contractor

Review and update the asbestos management plan at least annually or when required to ensure it is accurate and current.

11.8 Incidents

11.8.1 Discovery of ACMs

If suspected ACM is discovered the work activity should STOP immediately. The area should be evacuated and sealed off to prevent entry.

The person managing the works shall be notified immediately and must report All asbestos incidents and near misses to the Health, Safety, Compliance and Emergency Planning Team and the Head of Asset Management and Development, with either team updating the other on notification.

Upon notification of the discovery of suspected ACM, the retained Specialist Asbestos Contractor shall be advised so that samples can be taken. If the material is confirmed as containing Asbestos, an assessment by the Specialist Asbestos Contractor shall be undertaken to determine whether any of the works will result in people being exposed to Asbestos. If the assessment indicates no exposure is likely, the works may continue.

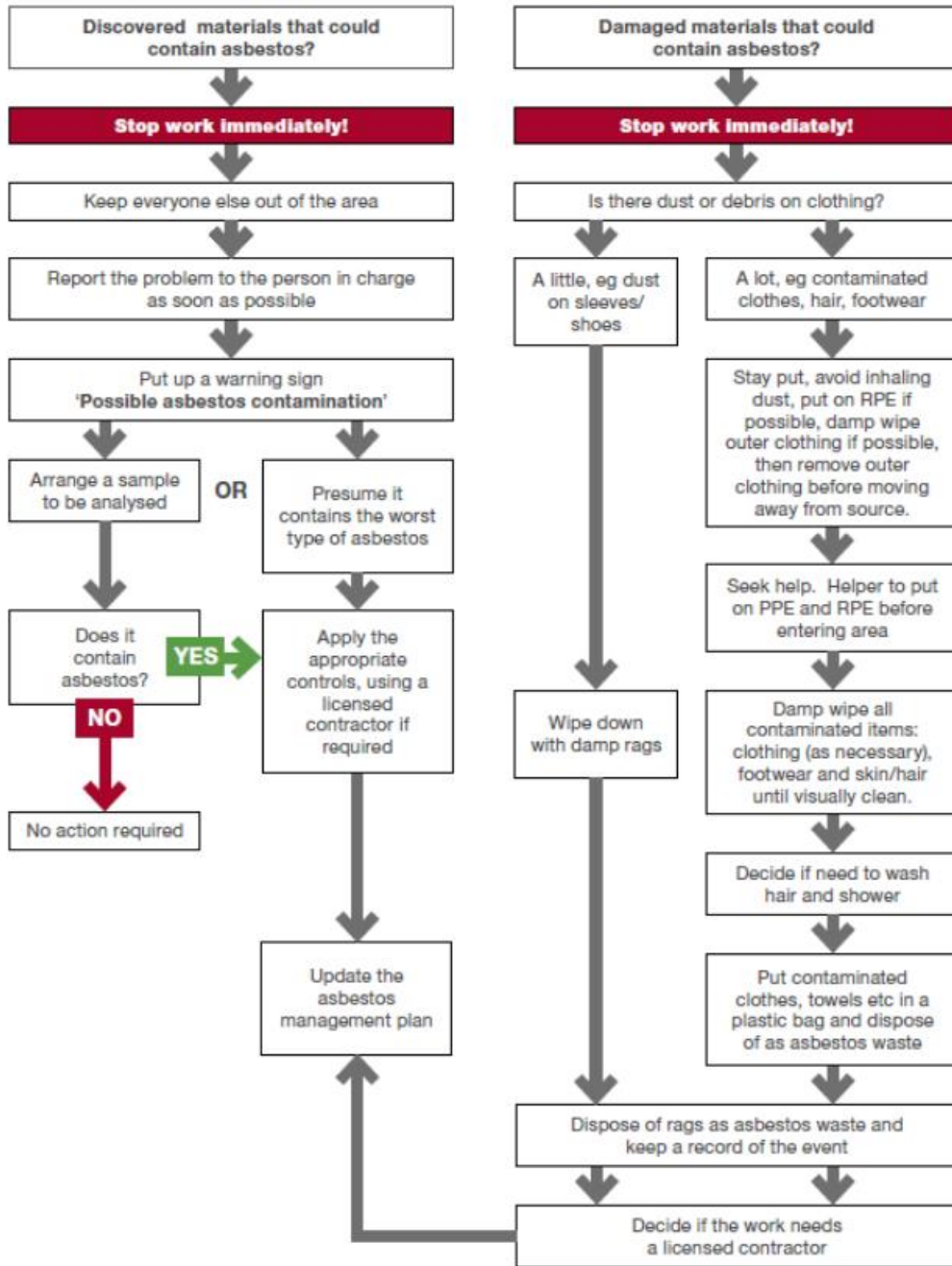
The Asbestos register should be updated. If the assessment indicates that exposure is likely, the Specialist Asbestos Contractor shall make recommendations as to the appropriate action required.

11.8.2 Inadvertent disturbance of material

In the event of any employee or contractor inadvertently damaging a product thought to be an ACM, the process shown in the flow chart must be followed.

In the event of any enforcement officer, or grounds maintenance employee inadvertently being exposed to a damaged product thought to be an ACM, the process in the flow chart should be followed.

Flow chart



11.9 Voids

BBC will carry out a full management survey of each property when it becomes void.

A refurbishment / demolition survey will be undertaken if appropriate where extensive void works are identified such as replacing a kitchen or bathroom. The results will be uploaded to the asbestos register held on One Housing System.

The housing officer will generate an "Asbestos in your Home" report for the new incoming tenant that will be provided at sign up alongside an Asbestos advice leaflet. The report will describe the locations of ACMs in the property and give advice on DIY in the home.

11.10 Repairs

When carrying out repairs and maintenance work our employees and contractors can prevent inadvertent exposure by carrying out the following:

- Review the asbestos register before commencing work.
- Proceed with caution, even when no ACM is recorded
- Arrange an asbestos management survey that complies with the current legislation/guidance when ACM is suspected
- Or treat as ACM and remove when appropriate / economic to do so, e.g. Artex, floor tiles. Apply the agreed control measures that are in place when carrying out any work that will disturb ACM.
- Report any damage or deterioration of ACM to the relevant contractor for remedial action.
- The Housing Team will only undertake the removal of licensed ACMs in un-occupied premises or in controlled conditions with the consent of the Head of Housing and Head of Asset Management and Development

11.11 Planned Projects and Capital Works

When undertaking any planned maintenance, we will ensure:

- A refurbishment / demolition survey is undertaken
- relevant information is included in the Health and Safety tender documentation
- If the works are “licensable” the contractor will submit a 14-day notification to HSE detailing their plan of work and the dates that the work will be undertaken.
- The contractor will provide risk assessments and method statements for approval by the Head of Asset Management and Development, and the Head of Planning and Economic Development and the appointed ‘Project manager.’
- The appointed contractor will assess the works and submit an ASB5 notification to the HSE 14 days before commencing the works; In addition, they must submit a Plan of works in accordance with HSG 247 for agreement with the Head of Asset Management and Development and the Head of Planning and Economic Development.
- On completion of the works the contractor will submit all relevant documents to the ‘Project manager’, Including the four-stage air clearance certificate, the waste Consignment notice and re-occupation certificate. This information must be stored on One Housing System.

Note: All air monitoring is to be undertaken by a UKAS accredited surveyor. Separate companies will be employed to undertake asbestos removal and air testing.

11.12 Disposal of Asbestos

All forms of Asbestos waste containing more than 0.1% Asbestos is classified as special waste and can only be disposed of at sites licensed to receive it.

The transfer of Asbestos waste materials is to be only undertaken by appropriately licenced carriers with disposal at a licensed waste site. Appropriate waste transfer notes shall be completed, and copies maintained by BBC using One Housing System or other relevant data management system.

12.0 Accessing Information

BBC will ensure that all current ACM information available for our directly managed housing stock is added to the digital Asbestos Register called Alpha Tracker.

This includes, but is not limited to the following information:

- Asbestos Policy
- Air monitoring results
- Waste consignment notes
- Asbestos Management Surveys
- Asbestos Refurbishment and Demolition Surveys
- Bulk Sampling
- Remedial & Removal Works documents
- Re-inspections

The asbestos register will hold information relating to all ACMs – identified and presumed.

The Asbestos Register will be made accessible to relevant employees.

The relevant responsible person(s) or appointed responsible person must be satisfied that the information in the asbestos register is known and understood by employees, contractors and sub-contractors doing the work on our premises and that any ACMs will not be disturbed during planned works.

Relevant information from the asbestos register will be provided to contractors and sub-contractors prior to any works starting on site to ensure that appropriate precautions are taken, and any asbestos risks are appropriately controlled.

Labels warning of the presence of asbestos containing materials will be affixed in communal areas, plant rooms and similar in accordance with asbestos labelling guidance. Such labels will be checked and maintained or replaced at suitable intervals.

Notification will be by the incident reporting form and send via email to Health.Safety@broxtowe.gov.uk. An investigation will commence as soon as practicable following notification.

If the incident involves significant disturbance of ACMs, the entire affected area must be cordoned off and entry prohibited until controlled air testing confirms the area/premises to be safe to reoccupy.

Where a release of asbestos fibres is sufficient to cause damage to the health of any person, the Health, Safety, Compliance and Emergency Planning Team and the Asset Management Team will review the incident and where required, report the incident to the Enforcing Authority (HSE) in accordance Dangerous Occurrences under RIDDOR.

The safety of our tenants, employees, contractors, sub-contractors, and members of the public is of the utmost importance. This Policy has been written to protect all

concerned considering all protected characteristics. We will ensure that relevant information is communicated in an accessible and understandable way with the aim of keeping tenants and those working for us or on our behalf safe. This Policy has direct and positive equality and diversity impacts.

13.0 Communications and Consultation

A controlled version of this Policy is published on our website – accessible to the public.

It is also published on our intranet along with relevant procedures, accessible to our employees.

The Health, Safety, Compliance and Emergency Planning Team, alongside the Asset Management and Development Team and Housing Team will liaise with all relevant teams and ensure this Policy and any procedures which implement it is clearly communicated.

New tenants will be given asbestos safety advice at sign-up and provided with an Asbestos Safety Report that gives advice and basic precautions. This leaflet will be available on the website along with further asbestos safety information.

BBC may also provide asbestos safety advice in various ways, including reminders on our website and specific advice following a property survey, or an alteration request.

In the formation of this Policy we consulted with employees, through our Health and Safety Committee, our General Management Team (GMT) and our Senior Management Team (SMT).

Subsequent reviews will be checked for change and accuracy prior to being reapproved and will include: -

- the effectiveness of the asbestos Policy
- training provided to employees and information provided to tenants and contractors.
- records of all asbestos incidents and review any learning.
- changes to legislation, best practice, guidance, or recommendations from reviews