

at home with...



Asbestos Management Plan

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1. Introduction

- 1.1 Fife Housing Group (FHG, the Group) is the trading name for Fife Housing Association Limited and its wholly-owned subsidiary Fife Housing Group Yourplace Limited.
- 1.2 The purpose of this plan is to:
- Ensure compliance with current asbestos legislation
 - Establish clear guidelines to be followed to ensure that all reasonable steps are taken to prevent the exposure of persons to asbestos
- 1.3 The Health and Safety at Work Act 1974, the Control of Asbestos Regulations 2012 (CAR) and all associated Approved Codes of Practice are committed to the effective management of Asbestos Containing Materials (ACMs) and place duties upon an employer to ensure that wherever reasonably practicable, workers are not exposed to asbestos and that others are not exposed to asbestos as a result of their activities. This duty applies to all premises, domestic, communal or non-domestic.
- 1.4 The Control of Asbestos Regulations were updated in 2012 and, in addition to the duties of employers, it imposes the 'duty to manage' in non-domestic premises. This includes communal areas of domestic buildings. A wide range of people potentially have obligations under this regulation, and the extent of the practical duties will be determined by contractual and other legal obligations to the property. In most cases, the 'duty holder' is likely to be the party that maintains the premises or has the majority of the obligation to maintain the premises.
- 1.5 The Civic Government (Scotland) Act 1982 also applies and relates to both communal areas of residences and domestic premises (private dwelling).
- 1.6 Breathing in air containing asbestos fibres can lead to asbestos-related diseases, mainly cancers of the lungs and chest lining. Asbestos is only a health risk if asbestos fibres are released into the air and inhaled. There is no cure for asbestos-related diseases.
- 1.7 This plan details what steps will be undertaken by FHG to ensure that the risk from known or suspected ACMs identified within any Group-owned or controlled properties is adequately managed, so that, as far as reasonably practicable, no one can come to any harm from asbestos. It also details the responsibilities of FHG and its colleagues, contractors and regular building users.
- 1.8 All requirements outlined below are **mandatory for all parties** involved.
- 1.9 The responsible officer for this policy is the Asset Manager (Responsible Officer).

2. General principles

- 2.1 Under the provisions of the Control of Asbestos Regulations 2012, Regulation 4, the Responsible Officer shall be the 'duty-holder' with respect to asbestos within FHG-owned and controlled properties.
- 2.2 As an employer and a landlord of tenanted housing properties, FHG will take all

reasonable steps to ensure the health, safety and welfare of all its colleagues and others, including contractors, visitors, clients, tenants and members of the public who may be affected by its activities.

- 2.3 This document sets out the policy for dealing with asbestos within the housing and commercial stock owned by the Group, which is known, presumed to be present or found to be present as a result of survey and/or testing and analysis. A list of current properties and the common areas to which this policy applies can be found on the housing database.
- 2.4 The main principles of asbestos management are to Assess, Record, Inform and Monitor [image source: NHS]:



- **Assess:** Asbestos in premises does not necessarily create an unacceptable risk. Asbestos is the hazard; the risk can only be defined when this hazard is assessed within the environment in which it is found. This assessment must take into account the activities carried out near or on the asbestos for the assessment to be able to present viable recommendations. This may take the form of a desktop study, a full asbestos survey, a partial survey or a combination of these.
- **Record:** All assessments and the location and condition of any known or presumed ACMs must be recorded, updated and regularly reviewed by the Officer requesting the initial inspection. Similarly, any changes to the condition or location of any known or suspected ACMs, any training, any controlled removal works, re-inspection, etc., must all be recorded. It is imperative that all asbestos documents are kept up to date, coherent and accessible.
- **Inform:** All asbestos records gathered must be made available to all relevant people at a suitable time. All colleagues, contracted workers, and regular building users may require access to asbestos records held for this site, and so they must be made available to anyone who may require them. Additionally, a system of training, seminars, question and answer sessions, as well as site inductions should be adopted where appropriate to ensure that everyone is kept informed about asbestos and that the information they have access to is relevant, accurate and understandable.
- **Monitor:** All ACM records, procedures, training and safe systems of work must be

regularly monitored and reviewed; this is an Approved Code of Practice (ACoP) requirement. The Asset Officer is responsible for reviewing and determining re-inspections and monitoring of asbestos where monitoring is required. The purpose of this ongoing monitoring is to ensure that the aims of this policy are being met; that all systems are efficient and workable and, as far as practicable, that no one is being exposed to asbestos.

- 2.5 For this plan, all types of asbestos will be defined generally as the term 'asbestos' requires the understanding and cooperation of all colleagues, building users and contractors who also have responsibilities to ensure a safe and healthy working environment is maintained at all times.

3. Asbestos Management Plan

- 3.1 The Control of Asbestos Regulations 2012 requires all duty holders, as part of their ongoing asbestos management, to have a written Asbestos Management Plan (AMP). This details what steps will be taken to effectively manage all items of asbestos. It details all assessments made of ACMs and provides priorities and procedures which must be followed.
- 3.2 The AMP is available to all those who plan, supervise or carry out maintenance works or other projects on any part of FHG-owned or controlled premises.
- 3.3 The AMP will be held for operational purposes by the OLT. The Asbestos Management Procedure included as Appendix 1 applies to the list of properties held on the housing database, plus the two commercial properties owned, being a shop and the Group's office premises.
- 3.4 The Responsible Officer will have all information required regarding the extent of the duties/duty holder for these areas as required by Regulation 4 of the Control of Asbestos at Work (CAWR) and other appropriate legislation.
- 3.5 The details of contracts/tenancy agreements may need to be referred to in establishing who is responsible for which aspects of the requirements and who may be reasonably required to co-operate with the duty holder with respect to the management of asbestos in common areas.
- 3.6 The AMP and related procedures are working documents and should be regularly updated, and colleagues briefed to ensure they remain valid. This will be managed and communicated by OLT when policies and procedures are reviewed.

4. Asbestos Register

- 4.1 Information regarding the location and condition of asbestos within FHG-owned and controlled premises has been recorded in the Asbestos Register and can be found by accessing the FHG Housing Management System. This AMP should be read in conjunction with the register held. The register sits in the Housing Management System and the information on the properties sits in the Document Management System. A report is to be created by IT to reflect all properties with asbestos held and their status.
- 4.2 All appropriate colleagues will be notified of the existence of the Asbestos Register

and the Permit to Work system, and work orders will automatically highlight any works where we may have any known asbestos in the property. Only when we know there is asbestos in the property would the operative be notified. If there is no record, we must assume that asbestos is present and, on arrival at the property, if a perceived risk is assumed, work must not progress without a full survey being completed. The Operative receives a flag of asbestos in the property when they are issued the job. The Operative assesses the risk as the area they are working in could potentially contain asbestos, and if so, they should call to request a copy of the survey and, if concerned the area is a risk, withdraw from the job and have a survey arranged.

- 4.3 The register is a working document and should be consulted prior to any work being undertaken. Where information on the presence/absence of asbestos is available, then it may still be necessary to ensure that the scope and limitations of any survey data held are fully understood.
- 4.4 The register will be available to our Internal Auditor should an audit be required and any reports will be reported to the Audit and Risk Committee.
- 4.5 No cloning of properties should be permitted, as materials may differ from property to property.
- 4.6 Regulation 4(9) of the Control of Asbestos Regulations 2012 states that: 'The measures to be specified in the plan for managing the risk shall include adequate measures for – (a) monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos'.

ACMs identified or suspected within the communal areas will be re- inspected at least annually to check that the condition has not changed, deteriorated or been damaged in any way. Re-inspections will be undertaken in accordance with the Approved Code of Practice, L143 second edition, 'Managing and working with asbestos'. Re-inspections will be undertaken by the approved asbestos UKAS or UKAT contractors. All works relating to asbestos and monitoring surveys, whether they are management, refurbishment, demolition or re-inspections, must be carried out by the appropriately qualified asbestos contractor.

- 4.7 All persons responsible for premises must ensure that any damage to ACMs are reported immediately to the Responsible Officer (or deputy, Asset Manager, where unavailable) and the Operations Manager.

5. Asbestos work

- 5.1 Properties built after the year 2000 do not require an asbestos survey.
- 5.2 All work involving asbestos removal will be undertaken by a licensed asbestos removal contractor, and appropriate certification will be provided for the removal and disposal of the suspected material.
- 5.3 All removal work will be carried out strictly in accordance with asbestos removal legal requirements.
- 5.4 A glossary pertaining to ACMs and asbestos can be found at Appendix 3.

- 5.5 Once removal has been completed, the Asbestos record must be updated on the Housing Management System (HMS) and Document Management System (DMS) and the key component updated.

6. Learning and development

- 6.1 All FHG colleagues at risk (including agency workers and sub-contractors) will be informed of the presence of asbestos within the existing housing stock and the Group's Asbestos Register as part of ongoing training.
- 6.2 All those who plan and manage works which may affect or be affected by asbestos will be given an appropriate level of training and help to understand their responsibilities and any information regarding asbestos.
- 6.3 Training records will be collated as training is undertaken and will be retained within the Human Resources System (HRS). They will detail the training given to each colleague. Any training certificates received will also be held on the HRS as a full record of training received.

7. Maintenance of records

- 7.1 Whilst every step has been taken to ensure exposure to asbestos does not occur, it is vital that good record-keeping is maintained.
- 7.2 The FHG Housing Management System will hold the asbestos components.
- 7.3 The Human Resources System will retain details of colleague training on ACMs.
- 7.4 Works orders will automatically extract ACMs' presence from the FHG Housing Management System. This happens as a highlighted flag but does not give specific information. This has to be requested.
- 7.5 All reports received from independent laboratories will be held within the Document Management System, filed against the property reference - reports such as any Airborne Fibre Monitoring Reports (this would include clearance and background testing) or any Bulk Sampling Certificates, etc., will be stored with the relevant Permit to Work within the Document Management System.
- 7.6 All details of asbestos removal or any remedial works undertaken on properties owned or controlled by FHG will be recorded. The records will be updated when new information becomes available during the implementation of each project.
- 7.7 Information regarding any exposure or near-miss relating to ACMs will be collated to detail the nature and known extent of any exposure to asbestos that has occurred in any property owned or controlled by FHG or to any colleague away from FHG premises but during work hours. Contractors, including asbestos removal contractors, will be expected to control the records of their own employees unless alternative arrangements have been agreed with FHG.
- 7.8 Only suitably qualified contractors will be employed by FHG to undertake licensable and

non-licensable asbestos works. Insurance certificates, licenses and health and safety policy records are requested before a contractor is approved and these will be stored within the Activity Drive.

- 7.9 It is expected that all other contractors, employed to undertake maintenance within FHG-owned or controlled properties, which may disturb the fabric of the building or known or presumed ACMs, have undertaken asbestos awareness training in accordance with Regulation 10. FHG is not responsible for providing third-party contractors with asbestos awareness training. They will, however, provide them with all relevant asbestos information to the planned works before they attend on-site and also during any pre-start meetings before works commence.
- 7.10 Records of all meetings held with contractors will be recorded in accordance with our Contractor Management Framework.
- 7.11 It is vital for ACM records to be current, with updates applied as soon as new data becomes available to FHG. Information will be updated in at least the following areas (this is not an exhaustive list, and should any officer be unsure, they must request clarification from the Operations Manager or Asset Manager):

Action	Recorded	Responsibility
Remedial or removal works	Noted as in progress and then on completion of works	Operations Officer or Supervisor/Asset Officer
Re-inspections, bulk sampling, further survey works (including refurbishment and demolition surveys for project-related work). Demolition surveys should be instructed by Housing/Operations should any concern or suspect material be found This includes the annual communal area inspections	Noted as in progress and then on completion of works	Assets Officer
Training/site inductions	Upon completion of training/site inductions Updated on Human Resources System	Operations Supervisor/Operations Manager/Asset Officer/Asset Manager
Accidental disturbance of known or suspected ACMs	Upon disturbance of asbestos	Operations Officer/ Operations Manager Asset Officer/Asset Manager (for contractor-related works)

Action	Recorded	Responsibility
Survey reports	On receipt following completion – Housing Management System updated and survey saved in the Document Management System	Operations Officer/ Supervisor/Asset Officer
Any changes made to the contact details for the Asbestos Coordinator and/or emergency contacts	If/when contact details are amended	Compliance Officer/ Health and Safety Committee
Any changes to the organisation structure of FHG which could affect asbestos management facilities	If/when organisation changes are made	Health and Safety Committee
Any new procedures adopted	If/when new procedures are adopted	Duty Holder/Health and Safety Committee

8. Publicising/availability of the policy

- 8.1 A copy of our policy is held in the Policy Drive and on our website. Tenants requiring a copy of this should direct their request through the Operations Team or access it from the website. Tenants requesting a copy of the asbestos report for their property should direct their request through the Operations Team. A controlled copy of the register (database) will be held by FHG and will be made available for viewing on request.
- 8.2 This policy will be provided to every colleague who may be exposed to ACM, primarily trade colleagues. It will be discussed at induction, team briefing and Toolbox Talk events.

9. Equality

- 9.1 In operating this policy, we will not discriminate between persons or groups of persons on the grounds of sex or marital status, racial grounds, or on grounds of disability, age, sexual orientation, language or social origin or of other personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.
- 9.2 All management of asbestos will be carried out in a fair and consistent manner.

10. Roles and responsibilities

- 10.1 This policy has been drafted in accordance with current health and safety guidelines and through consultation with the Business and Operational Leadership teams.
- 10.2 The Director of Operations takes lead corporate responsibility for health and safety matters and will report any concerns or near-misses relating to asbestos as a standard section of the Operational Report to the FHG Health and Safety Committee. The Responsible Officer is the Duty Holder for asbestos management.

- 10.3 Business Leaders are responsible for ensuring that this policy is consulted on with Board members and colleagues and for its review, implementation and proper application, in accordance with the agreed timetable.

11. Performance management

- 11.1 Any concerns regarding the adherence to this policy will be reported to the Duty Holder, the Health and Safety Committee and the Board.
- 11.2 Any breaches of this policy resulting in serious asbestos exposure, will be reported to the Health and Safety Executive under RIDDOR, depending on the level of risk. The level of risk and RIDDOR reporting depend on the on-site findings and level of risk and exposure found following assessment by consultant.

12. Review

- 12.1 This policy is due to be reviewed every three years, or earlier if a material change requires this. As the AMP and register is a live document, any changes to current regulations will be adopted as soon as they have been made available*.
- 12.2 Any review will take into account any changes in the following:
- A change in name and contacts for our licensed contractor*
 - Any change in contact names and details (excluding responsibilities)*
 - A change in the ICT systems where ACM data is stored*
 - A change in procedure
 - A change in legislative requirements*
 - A change in post responsibilities

* items not requiring the AMP to be re-approved by Board, as these are straightforward administrative amendments.

Important

Any work that may involve disturbing the fabric of the building MUST have an Asbestos Refurbishment Survey carried out prior to commencement of works:

- ☐ **Disturbing a building's fabric**
- ☐ **Cutting or removing decorative panels or sheet material**
- ☐ **Opening of voids within the property**
- ☐ **Any other activity which could potentially result in the release of asbestos fibres**

These must be notified in advance to either the Responsible Officer, Director of Operations, Operations Managers, Asset Manager, Operations Supervisors or Operations Officer in order that an assessment can be made as to whether an intrusive survey is required to establish the presence of hidden Asbestos Containing Materials (ACMs).

THE ASBESTOS EMERGENCY KIT IS LOCATED IN EACH OF THE FLEET VEHICLES AND MUST BE USED AS SOON AS ANY ACM IS SUSPECTED.

[repeats the information provided at the two-yearly and new starter training for all trades on ACMs].

The purpose of the Asbestos Management Procedure is to assist with the control and management of ACMs in the Group's properties and premises. All properties constructed prior to the year 2000 will be subject to this procedure.

1. Identification of asbestos

- 1.1 FHG will increase the intelligence of our stock with regard to asbestos by carrying out surveys to establish the presence, location and type of asbestos contained within a property owned by FHG.
- 1.2 Surveys will be carried out as follows:
 - Refurbishment survey on void properties (built before 2000) when major works are being carried out and ACMs are suspected
 - Refurbishment/demolition survey on properties due for major works (built before 2000)
 - Refurbishment survey on properties scheduled for medical adaptations (built before 2000)
 - On all common areas within closes that we manage.

2. Survey types

- 2.1 **Management survey** - an Asbestos Management Survey is a non-intrusive survey, which will be completed by a competent person and meet the criteria specified in Asbestos: The Survey Guide (HSG264). The surveyor completing this work is expected to be capable of determining the number of samples necessary in any given room based on the material, location and their experience. Management surveys sample all readily accessible suspect materials and are generally commissioned in order to develop general information on the incidence of ACMs across FHG's housing stock and any commercial premises.
- 2.2 **Refurbishment/demolition survey** - any works likely to damage the fabric of the building must have a refurbishment survey carried out prior to commencement of works. If down-taking or intrusive maintenance work is planned, then this survey should be completed instead of a management survey. Refurbishment/demolition surveys are undertaken where significant disruptive works will be carried out in properties. Whilst this typically relates to demolition and/or major refurbishment works, the HSE have issued guidance stating that this type of survey should be undertaken in advance of planned improvement projects, e.g. FHG's roofing, kitchen and bathroom replacement projects. These surveys sample all suspect materials and are intrusive, leading to possible damage to wall panels, floors, etc.). Whilst other organisations may accept representative sample testing and cloning, at FHG our procedure requires physical surveys at each and all impacted addresses for planned programmes and we do not accept cloning. Some cloning had previously been allowed on external contracts, but this practice is no longer permitted.
- 2.3 Surveys will be undertaken by a UKAS or UKATA Accredited surveyor/ commercial organisation.
- 2.4 Surveys will identify and record the location, extent, condition and type of any known or presumed ACM.

- 2.5 Surveys can be instructed by any member of the Operations or Asset Management teams, but all completed surveys must be copied to the Operations Manager.

3. Safe systems of working

- 3.1 FHG aims for a safe system of working and this procedure has been developed to ensure that relevant precautions are always taken to minimise the risk of any person being exposed to asbestos during the course of their work or tenancy. Our safe system of work covers:

- Asbestos surveying and removal
- Works carried out by internal trades
- External contractors
- Communicating with tenants
- Emergency procedures for unplanned incidents

3.2 Asbestos surveying and removal

- 3.2.1 FHG will appoint a suitably qualified contractor to carry out asbestos surveys and assess the risk in relation to ACMs by carrying out a material risk assessment and detailing:

- | | |
|----------------------|--|
| ✓ Property reference | ✓ Property address |
| ✓ Material type | ✓ Asbestos type |
| ✓ Location | ✓ Condition |
| ✓ Surface treatment | ✓ Recommendations to remove/monitor/label/manage |
| | ✓ Any new survey undertaken must be a whole-house refurbishment or demolition survey |

- 3.2.2 Each ACM is assigned a score to reflect its asbestos type, condition and surface treatment. This informs the categorisation of the potential for fibre release. The survey makes recommendations and assigns a priority category to the ACM.
- 3.2.3 The Asbestos Register forms the basis of the AMP. Survey results (including negative results) will be recorded on the Asbestos Register by the Operations Team and a copy of the report saved in the FHG Housing Management System. Where no information regarding ACMs is available, e.g. areas that could not be accessed during a survey, it must be presumed that ACMs are present and the register will reflect this.
- 3.2.4 FHG will only use UKAS or UKATA licensed contractors for the surveying, removal and testing of ACMs. In each case, as part of the appointment, we will request and retain the method statement pertaining to each address. This will be stored in the Document Management System and noted on the FHG Housing Management System.
- 3.2.5 It is not the policy of FHG to remove ACMs that are in good condition and present insignificant risk to the health of the property's occupants; however, we recognise the need for flexibility where there is a case made for specific removal and in the majority of cases where removal is possible, this will be instructed. If FHG decides to leave the asbestos in situ, then it will:

- ✓ Advise the tenant of our decision and any specific requirements to ensure health and safety is maintained - where information is to be provided to tenants, the asbestos consultant will provide the information and advice to be given to the tenant
 - ✓ Enter the details on the database and refer any user to a survey which will include a floor plan of the property with ACM areas highlighted
 - ✓ Ensure that all tenders for major works include reference to the Control of Asbestos Regulations 2012 and FHG's asbestos database
 - ✓ Work orders for routine maintenance will flag areas of ACM (see section for internal trades below)
- 3.2.6 Damaged ACMs will always be removed – it is no longer FHG policy to remediate or encapsulate where damage has occurred. The asbestos database will be updated to reflect the action taken.
- 3.2.7 Where ACMs have been identified as requiring removal, we will obtain a risk assessment, method statement and quotation for the work to be completed promptly. Following completion by the licenced contractor(s) of the removal works, the Operations Officer will receive a completion confirmation which will be saved in the Document Management System, and this must incorporate the following elements:
- ✓ Air monitoring test certificates
 - ✓ Contaminated waste certificates
 - ✓ Confirmation of the removal at the property address of all ACMs – to be used by the Operations Officer to update the FHG Housing Management System records
- 3.2.8 Where ACMs are in situ in communal areas, and are assessed as being in a sound condition or are already encapsulated, it remains vital that they are subject to an annual inspection, which will be evidenced by recording on the FHG Housing Management System and the Document Management System.
- 3.3 Works carried out by internal trades**
- 3.3.1 Prior to any work being instructed and carried out in properties owned or managed by FHG, the asbestos database must be consulted. This is a standard line on our work orders.
- 3.3.2 It is essential that this is checked when raising the job and the information is shared to the Trades Operative.
- 3.3.3 Trade members from the Operations Team who are carrying out work and suspect any presence of ACMs whatsoever must immediately ensure that the Emergency Asbestos Procedure is followed.
- 3.4 Works carried out by external contractors**
- 3.4.1 Prior to any work being instructed, whether to existing framework contractors or other external suppliers, and carried out in properties owned or managed by FHG, the asbestos database must be consulted and information in relation to ACMs communicated to contractors. This is a standard line on our work orders.

- 34.2 Any external contractor will be required to supply FHG with a copy of their own policies governing health and safety and asbestos management. It is likely that this will be included as part of the tendering process and in the assessment of 'quality'.
- 34.3 It is vital that the colleague who is instructing the work also ensures that the external contractor receives a site induction and is provided with all available asbestos information.
- 34.4 Contractors (including sub-contractors) working for FHG are responsible for ensuring that all colleagues under their control reference the asbestos database and understand its content and actions required. They are also responsible for ensuring all colleagues under their control work in line with the Group's Asbestos Policy, Asbestos Management Plan and Emergency Asbestos Procedure.
- 34.5 Prior to commencement, if a contractor suspects any presence of asbestos and they have not been notified previously, they must not start it and are required to contact the Operations Team or Asset Team for advice. If the property has not been previously surveyed and was constructed prior to 2000, the job should not have been awarded and must be immediately stopped and postponed until a survey is carried out.
- 34.6 When, during the course of any work, asbestos or material suspected of being asbestos, not identified by the asbestos database, is discovered, the contractor will ensure that:
- ✓ All work is stopped in the area
 - ✓ All persons are removed and kept out of the immediate vicinity without causing undue concern
 - ✓ The area is closed, sealed or locked off
 - ✓ Any equipment or materials are left in place. These will need to be disposed of as special waste, depending on the result of sampling
 - ✓ A warning sign(s) with the following, or similar, wording: 'POTENTIAL ASBESTOS HAZARD - KEEP OUT' is prepared and prominently displayed. Where this is not deemed appropriate to use this type of wording, alternative strict entry prohibition notices will be used
 - ✓ The Operations Manager or Asset Manager is to be notified immediately
 - ✓ Arrangements are made for the suspected ACM to be sampled by a competent Asbestos Surveyor and analysed by a UKAS Accredited laboratory. Arrangements are made for the suspected ACM to be sampled and air sample tests to be completed, where it appears the ACM has been disturbed

The above may vary depending on the particular circumstances involved.
Contractors must refer any queries to FHG at the earliest opportunity.

3.5 Communicating with tenants

- 35.1 On the granting of a new tenancy – using the data available from the register, the tenant will be advised of the presence, nature and location of any ACMs together with requirements to ensure health and safety is maintained. The tenant will also be provided with a copy of the safety leaflet.
- 35.2 During the tenancy - where asbestos materials are identified, are in good condition

and remain in situ, tenants will be provided with an information leaflet and from the asbestos database will be advised of the location of ACMs and the management of the material in situ.

- 3.5.3 The Tenant Handbook – this guide will include a section on asbestos within the home and how to ensure safe management.
- 3.5.4 Generally – newsletter articles and a safety leaflet will be produced to enable the provision of information regarding asbestos within the home.

3.6 Emergency procedures for unplanned incidents

- 3.6.1 See emergency requirements document at Appendix 2, which repeats the information given as part of our two-yearly/new starter induction training on ACMs.
- 3.6.2 This is received by all trades and persons employed by FHG **and retained within fleet vehicles for those** who could come into contact with potential ACMs.
- 3.6.3 Identification of damaged or disturbed suspect material - it is the responsibility of colleagues and contractors to report to FHG if they suspect that disturbed or damaged ACMs may be present in a property owned or partly-owned by FHG. Where this is suspected, the following applies:
 - ✓ Notification to the Operations Manager or Asset Manager at the earliest opportunity
 - ✓ Immediate contact with a licensed asbestos survey contractor to identify if the material contains ACMs
 - ✓ Where damage to any material known to contain asbestos has taken place and could give rise to airborne potentially respirable fibre release, the area must be isolated pending air-monitoring tests being carried out
 - ✓ Air monitoring tests will determine the level of any potential contamination, or provide reassurance that unacceptable contamination has not occurred
 - ✓ Where contamination, or potential contamination has occurred, and the property is deemed to be unsafe, then alternative accommodation will be sought by the Housing Team until the home is determined to be safe to return
 - ✓ Details of air test results will be made available for record purposes
 - ✓ Remedial action will only be required when airborne fibre levels exceed levels as stated in the 2010 Health and Safety Executive Guidance (HSG) 264 guidance
 - ✓ When remedial action becomes necessary after exposure, the relevant facts may have to be reported to the HSE in accordance with RIDDOR
 - ✓ Advice may be sought from a licensed asbestos survey contractor and health and safety consultants to determine whether the incident is in fact RIDDOR reportable

3.7 Commercial premises

- 3.7.1 This part of the regulations will not currently apply to us as we only have two non-domestic properties; our office and a shop, both of which were recently constructed and are free from ACMs. We should, however, have an awareness of this duty, should the acquisition of any non-domestic premises in the future be considered.

Appendix 2 - Asbestos Emergency Procedure

The Asbestos Emergency Procedure can be found at:

[W:\002 - Approved Procedures\Assets Procedures\AM6 - Asbestos Emergency\2026 04 08 Procedures AM6 Asbestos Emergency Procedure Aug2024-2027 FINAL.docx](#)

Appendix 3 - Glossary

Word	Description
Abatement works	Procedures used to control asbestos fibre release in a building or remove ACMs completely, including removal, encapsulation, encasement, repair and decontamination.
ACM	Asbestos Containing Material. Any product that contains asbestos, ranging from 100% concentration to less than 1%, and can be found in thousands of different products.
AIB	Asbestos Insulation Board. Commonly used as fireproofing, thermal protection, partitioning, ceiling tiles and soffits. Strict controls are in place in the UK for those working on AIB.
ACOP	Approved Code of Practice, a document giving practical guidance on compliance. ACOP L143, 'Managing and working with asbestos', specifically relates to the Control of Asbestos Regulations 2012).
Air-monitoring	A process which must be undertaken by an impartial UKAS-accredited laboratory and can be undertaken before, during and after asbestos removal works. A known quantity of air is sampled over a known period of time using a specialised air pump fitted with a filter. The fibres are then counted and a calculation used to assess the quantities of asbestos fibre in the air. There are four categories of air monitoring: 1. Background/reassurance - to establish fibre concentrations before any activity which may lead to airborne asbestos contamination. Reassurance sampling may be conducted in certain circumstances to confirm that the residual asbestos fibre concentrations are <0.01f/ml 2. Leak-testing - to ensure that the steps taken to prevent the enclosure leaking are, and remain, effective and it is not releasing airborne respirable fibres 3. Personal - the fibre levels obtained in personal sampling will reflect the nature of the work performed by the operator and the circumstances and conditions at the time of the sample 4. Four-stage clearance - including the sign-off through a 'Certificate of Reoccupation'
Amosite	Mineralogical name for 'brown' asbestos, named after the 'Asbestos Mines Of South Africa.'
Amphibole	A group of minerals which includes Amosite and Crocidolite asbestos.
Asbestos	Asbestos is the term for a group of minerals made of microscopic fibres. Asbestos was mined in many countries. If you breathe in the fibres, they can damage your lungs. There are four main diseases associated with breathing in asbestos fibres: ▪ Pleural disease, non-malignant ▪ Asbestosis, a non-malignant scarring of the lungs ▪ Asbestos-related cancer of the lung ▪ Mesothelioma, a cancer affecting the lining of the lungs

Word	Description
Asbestos cement	Can contain a mix of all asbestos types, but mainly Chrysotile (white asbestos) and usually contains up to 15% asbestos content. The cement is moulded and compressed to produce a wide range of pre-formed asbestos cement products. Asbestos cement products are generally classed as non-licensable and do not normally have to be removed by a licensed contractor but must be transported and disposed of as hazardous waste, avoiding breakage as this will lead to fibre release.
Asbestos Register	Where asbestos is present or suspected to be present in a commercial premise, the person with management or control of that premise is required to have a competent person assess and identify locations where asbestos is present. Details of any ACM's must be recorded in an Asbestos Register, which must be made available to a variety of persons.
Bulk sample	A sample of material, suspected to contain asbestos, such as boarding, textured coating, insulation or debris, taken by an accredited surveyor to be tested for asbestos by a UKAS-accredited laboratory.
Certificate of Reoccupation	Issued on-site to the client confirming successful completion of asbestos removal works. Once satisfactory results are achieved, the analyst will issue a Certificate of Reoccupation, which confirms people can safely re-enter the area.
CAR 2012	Control of Asbestos Regulations 2012.
Chrysotile	Mineralogical name for 'white' asbestos.
Control	A measure put in place to minimise or remove the risk of something happening.
Control limit	The control limit for asbestos is 0.1 f/ml of air. Worker exposure to asbestos fibres should be reduced to as low as is reasonably practicable and in any case below the control limits. Suitable Respiratory Protective Equipment (RPE) must be worn where exposure has the potential to exceed the control limit.
Contamination	Contamination is the presence of a constituent, impurity, or some other undesirable element, e.g. asbestos, that spoils, corrupts, infects, makes unfit, or makes inferior a material, physical body, natural environment, workplace, etc.
Crocidolite	Mineralogical name for 'blue' asbestos.
DCU	The main decontamination facility, often referred to as a hygiene unit or DCU, which can be a fixed, mobile or modular facility.
Decontamination	Refers to the removal of dangerous substances (asbestos) from an area, object or person. All personnel (workers and others) who enter enclosures or designated work areas are likely to become contaminated with asbestos and therefore need to decontaminate themselves when they leave.
Duty Holder	The Duty Holder is, in the case of FHG, the representative of the owner of the premises or the person or organisation that has clear responsibility for the maintenance or repair of FHG premises, for example, through an explicit agreement such as a tenancy.
Encapsulation	The term used to enclose or seal asbestos materials by a variety of methods, dependent upon the asbestos product type and condition.
Environmental clean	This term is widely used in the asbestos removal business. However, it is a descriptive industry term with no legal definition and not mentioned in

Word	Description
	Approved Codes of Practice or by the Health and Safety Executive.
Four-stage clearance	Four-stage clearances are a legal requirement for all licensed asbestos work and are carried out by a UKAS-accredited organisation. The process allows for impartial, expert confirmation that asbestos within an enclosure has been removed or remediated to the agreed scope and that the area is safe to reoccupy. On completion, a 'Certificate of Reoccupation' is issued on site to the client confirming successful completion of the works. The four stages of the four-stage clearance process are as follows: Stage 1: Preliminary check of site condition and job completeness Stage 2: A thorough visual inspection inside the enclosure/ work area Stage 3: Air monitoring Stage 4: Final assessment post-enclosure/work area dismantling
Friable	Easily crumbled. It is used to describe the properties of an ACM and the ease at which fibres are released to air from an AC.
Hazardous	Dangerous and involving risk, especially to someone's health.
HEPA filter	High Efficiency Particulate Air (HEPA) filter is a type of air filter. A HEPA filter must satisfy certain standards of efficiency and is a trademarked and generic term for highly efficient filters. It is used to remove any fibres in the air.
HSE	The Health and Safety Executive is the government agency responsible for the regulation of almost all health and safety risks arising from work activity in Britain.
HSG227	A comprehensive guide to managing asbestos in premises.
HSG247	Asbestos: The Licensed Contractors' Guide.
HSG248	The analysts' guide for sampling, analysis and clearance procedures.
HSG264	Asbestos: The survey guide. This replaced the now obsolete MDHS100 (Methods for the Determination of Hazardous Substances).
Identified L143 2nd Ed)	Recognition or proof of asbestos existing. Managing and Working with Asbestos is an approved code of practice and guidance. Two ACOP's, L127 (The management of asbestos in non-domestic premises) and L143 (Work with materials containing asbestos), have been consolidated into this single revised ACOP.
Licensable work	Refer to HSE guidance on what work is licensable here , also HSE's asbestos work categories here .
Licensed contractor	Higher-risk work must only be done by a licensed contractor who has been assessed, authorised and licensed by the HSE's Asbestos Licensing Unit as being competent to work with licensed materials. There are different types of licenses and the license must be checked to ensure it is current and valid for the type of work being carried out.
Location	The place or position where ACMs or asbestos is sited.
Management survey	A property is inspected and any suspect materials are sampled and analysed for asbestos content. A register documenting the location, extent and condition of the material is produced. Recommendations are also provided to ensure that areas of concern are made safe and that all asbestos-containing materials are safely managed. This is the

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	basic/minimum type of asbestos survey carried out.
Material	The physical substance containing asbestos.
Method statement	A document outlining the method by which the Licensed Removal Contractor will remove and dispose of the ACMs, often included in the Plan of Works.
MMMF	Man-made Mineral Fibre. These products are often used as an asbestos alternative and include products such as fibreglass.
Negative Pressure Unit	Used in licensable works to achieve negative pressure in an enclosure, sometimes also referred to as an 'Air Mover'. The purpose of an NPU is to ventilate the enclosure and stop asbestos fibres escaping. The NPU incorporates a HEPA filter to remove any airborne asbestos fibres.
Non-licensable work	Work with asbestos-containing materials that does not require a license as the products are deemed to be lower risk.
Notifiable Non-Licensed Work	Requires the employer to notify the HSE and is known as Notifiable Non-Licensed Work (NNLW). An employer or contractor can notify the HSE via an online form: ASB NNLW1-Notification of Non-Licensed Work with Asbestos .
Notification period	The HSE require that a two-week notification period is given prior to licensed works. The Licensed Asbestos Removal Contractor submits this to the HSE. However, the HSE Notification Form ASB5 must be accompanied by a Method Statement and it will take a few days to prepare. Realistically, one should therefore allow a minimum of three weeks from the date of order for the work to commence.
Personal Air Test	An air test affixed to an individual to assess the person's risk and confirm the adequacy of respiratory protection
Phase Contrast Microscopy (PCM)	This is the method used for assessment of air samples. After air sampling, the analyst will check the final flow rate and collect samples for phase contrast microscopy analysis. Fibres of appropriate dimensions on a measured area of filter are counted visually using phase contrast microscopy (PCM), the number concentration of fibres in the air is calculated and a pass/fail given, relative to the clearance indicator level (0.01f/ml).
Plan of works	The plan by which the Licensed Asbestos Removal Contractor (LARC) will define the transit routes, enclosure area, skip location, Negative Pressure Unit location, etc.
PPE	Personal Protective Equipment, such as masks, overalls, gloves and footwear.
Polarised Light Microscopy (PLM)	The principal method used to scientifically identify which of the six asbestos types is present, on the basis of their exact optical properties.
Priority	Order in which asbestos must be dealt with due to its importance.
Reassurance Air Test (RAT)	Air sampling, which may be conducted in certain circumstances, to confirm that the residual asbestos fibre concentrations are <0.01 f/ml. For example, after the removal of an enclosure.
Recommendation encapsulation	Some exposed or damaged asbestos material may require encapsulation that can significantly reduce the risk posed by the material. Once encapsulated, it may be suitable to simply manage the asbestos through an effective re-inspection regime. The re-assessment of the material will dictate this outcome. Encapsulation involves the creation of a covering or structure built around the asbestos so that it is completely covered to prevent exposure of the asbestos to air and other substances.

Word	Description
Recommendation manage	Asbestos that is in good condition and is unlikely to be disturbed can be simply managed. However, an appropriate re-inspection regime will still need to be implemented to ensure the condition of the material or building use does not change.
Recommendation removal	The recommended approach is to have the asbestos physically removed. Recommendations are based on the parameters available at the time. New information or a change in circumstances may alter these recommendations. All products falling under the Asbestos Licensing Regulations will require a licensed contractor.
Refurbishment/demolition survey	This type of survey looks beyond the surface of the property, and its aim is to find asbestos materials hidden within the structure of the building. It is an intrusive method of inspection and sampling and should be undertaken prior to any demolition/major refurbishment works, to prevent accidental exposure of maintenance and demolition workers to asbestos.
Register	See 'Asbestos Register'.
Respirator zone	Where the airborne asbestos fibre level is likely to or does exceed the Control Limit, the area affected must be designated as such and RPE must be worn.
Risk	The possibility of something harmful occurring.
RPE	Respiratory Protective Equipment: the different types of face masks worn appropriate to the risk.
Scope of works	A detailed plan of works, including site plans containing the extent and nature of the works.
Site Clearance Certificate for Reoccupation	Following asbestos removal, the premises must be assessed to determine whether they are thoroughly clean and fit for reoccupation (or, as appropriate, demolition). The clearance certification process is a vital component in asbestos removal work. The issue of a Certificate of Reoccupation by an impartial and competent organisation provides the crucial reassurance and security to the subsequent building users. The multi-stage certification process is designed to allow the inspection and assessment to be performed in a structured, systematic and consistent manner. Sampling for certification of reoccupation should take place only when the enclosure is dry and a visual inspection confirms that it is free from debris and dust.
Specification	A precise and detailed description, e.g. how work should be done or what materials must be used.
Type 1 survey	A type of survey and term no longer in use or referred to as a 'visual or walk around' survey completed without disturbing the fabric of the building. Samples were not usually taken.
Type 2 survey	A type of survey and term no longer in use or considered compliant, refers to a more intrusive survey including areas such as suspended ceilings, accessible ducts and other accessible voids. Samples were almost always taken and required for the asbestos register. Also referred to as a sampling survey, now superseded by a Management Survey.
Type 3 survey	A type of survey and term no longer in use or considered compliant, a pre-demolition survey taking core samples from partitions, lifting floorboards and investigating back to the structure, where possible. Required prior to any refurbishment or demolition projects, superseded by a refurbishment/demolition survey.

Word	Description
UKAS	United Kingdom Accreditation Service is the sole national accreditation body for the United Kingdom. Recognised by the Government to assess, against internationally agreed standards, organisations that provide certification, testing, inspection and calibration services. Accreditation by UKAS demonstrates that an Asbestos Consultancy has the competence, impartiality and performance capability.
UKATA	A not-for-profit association established to be recognised as the asbestos industry's key training association. Committed to both maintaining and improving higher standards of asbestos training through ongoing monitoring of UKATA-approved training providers.
Visual inspection	An inspection of the enclosure or site by the analyst to see if all the ACMs specified have been removed before carrying out an Airborne Fibre Count within this area, as part of the four-stage clearance. The analyst must check: ▪ Completeness of the removal of the ACMs from the underlying surfaces ▪ Presence of any visible asbestos debris left inside the enclosure and airlocks or work area ▪ Presence of fine settled dust

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