

1. Asbestos Policy

2. Reference Number 1.0

3. Purpose

- 3.1 This policy sets out how Bromsgrove District Housing Trust (bdht) will identify, manage, and control asbestos-containing materials (ACMs) within its properties to protect tenants, employees, contractors, and visitors from the risks associated with asbestos exposure. It supports compliance with the Control of Asbestos Regulations 2012, which remain the core legal framework for asbestos management in 2026.

4. Scope

- 4.1 This policy applies to:

- All non-domestic areas and common parts of domestic premises (e.g., stairwells, corridors, plant rooms), which fall under the “Duty to Manage” in CAR 2012 Regulation 4. This includes, but is not exclusive to, the common areas of independent living schemes, communal hallways of blocks of flats, and garage sites.
- All staff, contractors, and others undertaking work that may disturb asbestos.
- Domestic premises where work activities trigger duties under the Health and Safety at Work etc. Act 1974 and COSHH Regulations.

- 4.2 There is no general legal duty to manage asbestos within individual homes/flats unless work activities occur, but the Association will adopt a risk-based approach for tenant safety. We will keep an accurate record of work carried out in domestic dwellings.

5. Legal & Regulatory Framework

- 5.1 The Association will comply with the following:

Policy: Asbestos	Version: v1.0	Lead Officer: Sean Tomkins
Approved by: EMT	Date Approved: 23 April 2026	Review Date: April 2029

- **Control of Asbestos Regulations 2012 (CAR 2012)**
Primary legislation for asbestos management, including licensing requirements, risk assessment, and the duty to manage in common areas.
- **Health and Safety at Work etc. Act 1974**
General duty to ensure the health and safety of employees, contractors, and others who may be affected by our activities.
- **Management of Health & Safety at Work Regulations 1999**
Requirement for suitable and sufficient risk assessments.
- **COSHH Regulations**
Control of hazardous substances, including asbestos where the duty to manage does not apply.
Emerging 2026 regulatory trends include stricter enforcement, improved survey documentation, and enhanced monitoring of asbestos in refurbishment and demolition work.

6. Policy Commitments

6.1 Identification and Surveying

- Conduct management surveys of all common areas to identify ACMs and assess condition, as required by CAR 2012 Reg.4.
- Undertake Refurbishment & Demolition (R&D) surveys before intrusive works, reflecting strengthened 2026 expectations for detailed pre-renovation surveys.
- Ensure surveys include:
 - Full access to relevant areas
 - Adequate sampling
 - Risk-based categorisation of ACMs

6.2 Asbestos Register

- Maintain an up-to-date Asbestos Register documenting the location and condition of all known or presumed ACMs in common parts.
- Update the register following surveys, re-inspections, or removal works.

6.3 Asbestos Management Plan

The Association will maintain a live Asbestos Management Plan outlining:

- Responsibilities
- Processes for informing contractors and staff

Policy: Asbestos	Version: v1.0	Lead Officer: Sean Tomkins
Approved by: EMT	Date Approved: 23 April 2026	Review Date: April 2029

- Monitoring and reinspection schedules
- Emergency procedures

This aligns with CAR 2012 expectations for structured management arrangements.

6.4 **Management vs. Removal**

The Association will:

- Manage asbestos in situ when ACMs are in good condition and unlikely to be disturbed, consistent with sector best practice and CAR 2012.
- Arrange removal or encapsulation when:
 - ACMs are damaged or deteriorating
 - Planned works risk disturbing ACMs

ACMs are located in high-risk/common access areas

6.5 **Communication**

The Association will:

- Provide accurate asbestos information to contractors, maintenance teams, and staff prior to work commencing.
- Provide tenants with clear safety messaging about asbestos, including reassurance where ACMs are safely managed.
This supports improved communication expectations highlighted in recent regulatory guidance.

6.6 **Training**

- Provide asbestos awareness training for relevant staff and contractors in line with CAR 2012.
- Ensure only licensed contractors undertake work requiring a licence, as enforced under CAR 2012 and HSE requirements.

6.7 **Monitoring & Reinspection**

- ACMs in situ will be subject to periodic monitoring and condition assessment.
- Re-inspections will follow HSE guidance and updated 2026 best-practice expectations for tighter monitoring regimes.

Policy: Asbestos	Version: v1.0	Lead Officer: Sean Tomkins
Approved by: EMT	Date Approved: 23 April 2026	Review Date: April 2029

6.8 Recordkeeping

In line with CAR 2012 and HSE guidance, the Association will maintain records covering:

- Survey reports
- Asbestos register
- Risk assessments
- Training records

Removal/encapsulation documentation

7 Roles & Responsibilities

7.1 Board / Executive Team

- Ensure this policy is implemented, resourced, and monitored.

7.2 Health & Safety Lead / Compliance Manager

- Maintain asbestos register and management plan.
- Commission surveys and specialist contractors.

7.3 Repairs & Maintenance Teams

- Review asbestos information before work.
- Report suspected ACM deterioration.

7.4 Tenants

- Must not disturb building fabric.
- Should report damage immediately.

8 Emergency Procedures

8.1 If suspected asbestos is disturbed:

- Stop work immediately.
- Evacuate area.
- Isolate access.
- Report to the bdht Compliance Team

Policy: Asbestos	Version: v1.0	Lead Officer: Sean Tomkins
Approved by: EMT	Date Approved: 23 April 2026	Review Date: April 2029

9 Equality, Diversity & Inclusion

- 9.1 At bdht, we are proud to serve and work within a diverse society. We recognise that some individuals and communities face systemic barriers, disadvantage, and discrimination, including those related to socio-economic background, caring responsibilities, and the impact of intersectionality.
- 9.2 We believe that discrimination in any form is unacceptable. In all our areas of work we are committed to ensuring that our policies, practices, and services promote fairness, equity, and respect for all. We aim to *reduce inequalities, promote respect, and create an equitable culture within our organisation*.
- 9.3 bdht fully complies with the Equality Act 2010 and all relevant statutory and regulatory guidance, including that issued by the Regulator of Social Housing, Homes England, the Government Equalities Office, and our funding partners.
- 9.4 We believe that equality of opportunity is fundamental to delivering excellent services and building vibrant communities together. Our commitment is underpinned by clear policies, regular monitoring, and continuous review, all of which are actively supported by our Board and Teams.

10 Review

- 10.1 This policy will be reviewed every three years, or sooner if:
- Legislation or HSE guidance changes
 - Significant incidents occur
 - Internal audits identify improvements
- Given ongoing regulatory review activity in the UK, including discussions around stronger monitoring and compliance frameworks, regular review is essential.

11 Supporting Documentation

- Asbestos Register
- Asbestos Management Plan
- Survey Reports
- Contractor Competency Records

12 Review Date

- 12.1 This policy will be reviewed in April 2029.

Policy: Asbestos	Version: v1.0	Lead Officer: Sean Tomkins
Approved by: EMT	Date Approved: 23 April 2026	Review Date: April 2029

Policy: Asbestos	Version: v1.0	Lead Officer: Sean Tomkins
Approved by: EMT	Date Approved: 23 April 2026	Review Date: April 2029