

# Housing Asbestos Policy and Management Plan

## 1. Overview / Policy Statement

- 1.1 South Oxfordshire and Vale of White Horse District Councils (the councils) have a Health and Safety Policy which states the councils' commitment to providing a safe environment for tenants in their homes and for all those affected by our activities. This includes contractors, suppliers, and visitors to our properties.
- 1.2 In recognition of this commitment, the councils acknowledge the serious health hazards associated with exposure to materials containing asbestos. The councils accept responsibility under legislation to protect employees and others who may be at risk from asbestos in buildings owned, leased and managed by the councils. Duties will be fulfilled by reducing, as far as is reasonably practicable, the risk of exposure.
- 1.3 To this effect, we will:
  - Put in place an Asbestos Management Plan that reflects best practice requirements
  - Carry out surveys and manage asbestos risk in accordance with current legislation, guidance and good practice, including the Health and Safety Executive's (HSE's) Advisory Note on refurbishment of housing stock likely to contain asbestos
  - Assess and manage the risk from Asbestos Containing Materials (ACMs) identified within our housing stock
  - Provide information about the presence, location and condition of ACMs to employees, contractors and where appropriate, residents
  - Ensure that appropriate control measures are taken by persons likely to disturb ACMs
- 1.4 The Development and Corporate Landlord Operations Manager and Housing Delivery Manager will have overall responsibility for the policy and management plan, with day-to-day responsibilities designated to the Development and Corporate Landlord Property Operations team. Appropriate resources will be provided to implement the policy.

### Asbestos Explained

- 1.5 Asbestos is a general name for the fibrous form of several naturally occurring minerals. It resists rot, can be divided into fibres and woven, is insoluble, resistant to destruction by heat, acids and alcohol and is non-flammable. The fibre can be

used to reinforce plastic and cement products to produce thermal insulation in high temperature areas and can be used as a fire-resistant coating. Various types of asbestos differ in their chemistry, the way they are formed, and in the size and shape of their fibres.

1.6 Three kinds of asbestos have been used as building/construction materials for many years. These are:

- White Asbestos (Chrysotile):  
Mainly found in asbestos-cement products such as panels / boards, guttering and drainpipes, cold water storage tanks, roofing sheets/slates and tiles, soffit boards, wall cladding, artex coatings, floor tiles and sheet lino, gaskets and is a common filler or reinforcement in products such as mastics, adhesives and paints.
- Brown Asbestos (Amosite):  
Mainly found in fire resistant insulation wall panels, ceiling tiles and boards, sprayed asbestos limpet coatings and pipe / boiler insulation.
- Blue Asbestos (Crocidolite):  
Mainly found in insulation mattresses and as reinforcement in asbestos cement (such as pipes, sheets, moulded products, etc.) and sprayed thermal and acoustic insulation.

1.7 When asbestos is cut, ground, or when an item containing asbestos is damaged, fine fibres are released into the air. These fibres are invisible to the naked eye but present a health hazard as airborne fibres can be inhaled and trapped in the lungs causing scarring and triggering a number of diseases including lung cancer, asbestosis and mesothelioma. The damaging effects of these types of cancer may not become apparent for many years.

## **2. Objectives**

2.1 The objectives of this policy and management plan are to ensure that the councils:

- Meet and exceed the requirements of the Control of Asbestos Regulations 2012
- Maintain an accurate and up-to-date Asbestos Register
- Ensure safe systems of work where asbestos may be present
- Keep tenants and contractors informed about asbestos risks
- Conduct appropriate surveys and risk assessments
- Provide adequate training and supervision

## **3. Scope**

3.1 This policy applies to all housing accommodation provided by the councils.

## **4. Roles and Responsibilities for Delivery**

- 4.1 This section outlines the different roles and responsibilities for the delivery of this policy.
- 4.2 The roles and responsibilities for delivery are as follows:
- The Development and Corporate Landlord Operations Manager: Overall responsibility for asbestos policy implementation
  - Housing Delivery Manager: Oversight of surveys and tenant liaison
  - Contractors: Compliance with training, awareness and safe working procedures

## 5. Relevant Legislation

- 5.1 The relevant legislation (and regulations) includes the following:
- [Regulatory standards for landlords - GOV.UK](https://www.gov.uk/government/organisations/hse/about/hse-topics/asbestos)
  - The Control of Asbestos Regulations 2012 (CAR). Although Regulation 4 of CAR does not apply to domestic living spaces, other parts of CAR do place duties on Registered Providers
  - The Construction (Design & Management) Regulations 2015 (CDM) and the Health & Safety at Work Act 1974 (HASAWA) apply to domestic premises
  - The general duties in Section 3(1) of the Health and Safety at Work etc. Act 1974 apply to protect householders from any risks from work activities being carried out in their homes. Where work being done involves asbestos containing materials then The Control of Asbestos Regulations 2012 will also apply
  - L143 Approved Code of Practice and guidance
  - HSE guidance (HSG264: Asbestos: The Survey Guide)
  - UKAS accreditation standards ISO/IEC 17020 and 17025

## 6. Relevant Policy and Procedure

- 6.1 The relevant council policy and procedures are listed below:
- Housing Compliance Policy
  - Housing Electrical Safety Policy
  - Housing Gas Safety Policy
  - Housing Fire Safety Policy
  - Housing Compliance Policy
  - Housing Void Policy
  - Data Protection policy
- 6.2 The relevant health and safety policy and codes for the councils will also apply to this policy. This includes, but is not restricted to:
- First Aid
  - Violence and Aggression at work
  - Workplace Safety
  - Working at Height
  - Electrical Safety Personal Protective Equipment
  - Asbestos Management
  - Incident Reporting and Investigation

- Manual Handling

## **7. Policy and Procedure**

### **Management Plan**

- 7.1 In line with current best practice, the Development and Corporate Landlord Property Operations team proposes to meet and exceed the requirements and guidelines set out within L143.
- 7.2 The Approved Codes of Practice clearly details what is expected from a Management Plan and the parameters organisations should work to in managing both routine and planned works.
- 7.3 Information from Management Surveys will also be enhanced with data from more intrusive surveys which may come from void works or planned refurbishment works.
- 7.4 The overall aim will be for the Development and Corporate Landlord Property Operations team to develop their Asbestos Register to an extent that where management survey data is held for all premises.
- 7.5 There will always be the potential for ACMs not to have been identified before maintenance and refurbishment work has been carried out.
- 7.6 In these circumstances Development and Corporate Landlord Property Operations team will put in the following management arrangements:
  - Contractors will need to demonstrate adequate asbestos training of trade's people and work procedures (to cover awareness, including identification).
  - Contractors will need to demonstrate that asbestos registers are checked before work commences, and that there are procedures for dealing with any suspect/ suspicious materials.
  - Adequate supervision to ensure procedures are implemented and followed.
- 7.7 The identification and assessment of all asbestos containing materials within the councils' housing stock will require significant resources and cannot be achieved in the short term. However, the Development and Corporate Landlord Property Operations team will introduce, as part of its Asbestos Management Plan, a programme of planned management surveys and risk assessments to minimise the potential exposure to asbestos containing materials.

### **Managing Asbestos in Place**

- 7.8 As part of the management process, contractors will be notified of the presence of asbestos materials. Information gained from the risk assessments will determine what works will be undertaken and this would incorporate either no works, sealing, encapsulating or where appropriate removal. For any items which are left alone or sealed a review inspection programme will be introduced to monitor the condition of ACMs on a yearly/biannual basis depending on the level

of risk imposed.

- 7.9 The aspiration is to provide residents with specific ACMs survey data as well as generic safety information. Initially this will be provided in void-packs following re-let.
- 7.10 If works involving the removal or encapsulation of asbestos must occur while a property is tenanted to make that property safe, a risk assessment for the tenant will be conducted. If it is safe for the tenant to remain in situ (for example if the works involve sealing asbestos and are highly unlikely to release asbestos dust), the councils will inform the tenant of the works and provide information about staying safe. If, however, the works would make the property unsafe for tenants (such as the removal of asbestos, which creates asbestos dust), the councils will provide impacted tenants with suitable alternative accommodation until their home is made safe.
- 7.11 If the councils are made aware of a potential accidental uncontrolled release of asbestos in any of our homes via a report from a tenant, housing officer, contractor or third party, the councils will investigate. If an accidental release is identified, the councils will carry out the Accidental Asbestos Release Management Plan laid out later in this policy.

### **Labelling Of Asbestos**

- 7.12 Asbestos materials within dwellings, other than those in concealed locations, will not generally be labelled because labels may be aesthetically unpopular with tenants and would be unsightly. Furthermore, if provided they would probably not be permanent.
- 7.13 Although labelling of ACMs has been carried out sporadically in the past, it not our policy to use or rely on labels. This is due to the inherent risk of labels peeling off or otherwise disguised.

### **Inspection Programme of Asbestos Materials**

- 7.14 Where ACMs are left in-situ in common areas of the hostels an inspection programme will be introduced to ascertain whether the condition of the material has changed over time. The minimum frequency for reinspection and updating records is at least once every 12 months in accordance with Regulation 4 of CAR 2012.
- 7.15 In addition to the above arrangements the following opportunities will be used to collect information. We will:
- Carry out survey inspections when homes become void.
  - Provide an appropriate level of training to surveyors and staff with management responsibility for buildings to identify any damage or deterioration to asbestos materials in accordance with Regulation 10 of CAR 2012.
  - Provide residents with general information regarding asbestos risks, and we will give guidance on proper actions if asbestos is disturbed or

damaged. This would then be followed up with an inspection by an Asbestos Surveyor where necessary.

### **Contractors Working with Asbestos**

- 7.16 The contractor will need to physically demonstrate to the Development and Corporate Landlord Property Operations team on a regular basis that they have checked the Asbestos Register prior to carrying out works to an individual property – a failure to do so will lead to a warning, if the offence is repeated their contract will be terminated.
- 7.17 In the case of emergency responses, the responding contractor's staff will be expected to carry in person an up-to-date copy of the register which can be referred to, if and when required. The councils' Development and Corporate Landlord Property Operations team will also be provided with the above register in the case of emergency call outs. This information should then be made available to emergency services out-of-hours upon request.
- 7.18 Development and Corporate Landlord Property Operations team will ensure that its Asbestos Register is robust, and that all surveyed data, updates on condition of ACMs and removal of ACMs are carried out on a regular basis.
- 7.19 Prior to carrying out non-licensed removal or encapsulation work contractors will need to provide the councils with their method statements on how they propose to undertake the works. They will also be expected to dispose of waste in accordance with relevant waste legislation and duty of care.
- 7.20 All other forms of non – licensed or licensed work will be undertaken by the termed Licensed Contractor. The licensed contractor would be expected to provide method statements/ a plan of work to monitor the asbestos works, notify the HSE where applicable, ensure that air monitoring (as a minimum) is undertaken at the end of the works and possibly during the works. All certifications must be passed onto Development and Corporate Landlord Property Operations team, including disposal and air test certification. The Asbestos Register will then be updated.
- 7.21 Where the removal or encapsulation is required by the termed licensed contractor the following response timescales are required:
- Decent Homes/ Planned works: within 20-25 days of the works request
  - Void works: within 3-20 days of the works request
  - Responsive Repairs: within 10 - 20 days of the works request
  - Emergency Response: Within 4 hours of notification

### **Minimum Accreditation for Licensed Contractor**

- 7.22 The removal and encapsulation of asbestos will be undertaken by a nominated Asbestos Contractor who will be a member of the Asbestos Removal Contractors Association (ARCA) and will be licensed by the HSE under the provisions of regulation 8 of the Control of Asbestos Regulations 2012. These will be appointed under a term contract, to ensure speed of response and value for

money.

## **Role & Use of the Asbestos Register**

- 7.23 The Asbestos Register will be used as the primary tool for identifying recording and managing asbestos containing materials within our building stock.
- 7.24 The register will be used as a working tool and will allow:
- The Development and Corporate Landlord Property Operations team to undertake desktop evaluations of the housing stock to establish probable asbestos status of properties; this in turn will drive the management plan for identifying asbestos within properties. This will be utilised by primarily responsive repair contractors. However, all contractors who work within our properties will be expected to utilise the data.
  - Information about asbestos locations to be incorporated into Health and Safety plans and files produced as a requirement of the Construction (Design and Management) Regulations 2015 (the CDM Regulations).
  - An up-to-date record to be kept as to whether ACMs are removed, sealed.
  - The identification and recording the condition of ACMs and the set-up of monitoring procedures.
  - The provision of information to be given to tenants and managers about any asbestos materials in their homes or building with advice about how it should be looked after.

## **Maintaining the Asbestos Register**

- 7.25 Development and Corporate Landlord Property Operations team will maintain an Asbestos Register. This will be based on and updated from information gained from surveying premises that will underpin the Management Plan. The surveys of the housing stock will establish the location, type and condition of any asbestos present in each property.
- 7.26 The Asbestos Register will contain:
- A complete list of all properties, and individual dwellings.
  - Details of any asbestos materials found in properties surveyed or visually inspected, giving details of its location, the type of material and the type of asbestos it contains.
  - Each asset survey will define the asbestos containing materials identified which will be risk assessed in the form of an algorithm (mathematic formula), taking into account the condition of the material, its accessibility, location, susceptibility to damage, surface treatment, type of asbestos, nature of material and asbestos content. This information will determine whether the identified areas of ACMs will need to be either left in-situ, encapsulated, sealed or removed.

## **Updating the Register**

- 7.27 The Development and Corporate Landlord Property Operations team will take appropriate steps to keep up to date information in the register on:
- Un-surveyed properties

- Additions/deletions to the housing stock
  - Asbestos removed/encapsulated and sealed
  - Changes in the condition of asbestos material
  - Recording all licensed and unlicensed work carried out by the contractors
- 7.28 Further information about un-surveyed properties surveys will be collated and recorded by:
- Carrying out asbestos management surveys
  - Updating information when the opportunity arises, e.g. when a property becomes void, or a survey in response to repair requirements is requested
  - Carrying out R&D surveys prior to any major planned maintenance or improvement works
- 7.29 In addition to updating information about previously un-surveyed properties, the following will also be taken into account:
- Deletions from and additions to the stock
  - Asbestos encapsulation works
  - Planned asbestos removal works
  - Asbestos removed during planned maintenance or improvements works
  - Changes in the condition of asbestos left in place, for example evidence of damage where none was recorded before
  - Updating information and correct any data which is found to be incorrect

## **Asbestos Surveys**

- 7.30 There are two different types of surveys: Management Surveys and Refurbishment and Demolition surveys.

### *Management Surveys*

7.30.1 This is the standard survey. Its purpose is to locate as far as is reasonably practical the presence and extent of any suspect ACMs in the building which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

7.30.2 The survey will usually involve sampling and analysis to confirm the presence or absence of asbestos. This survey type is limited in its scope and extent of physical intrusion and cannot therefore be relied on as providing sufficient information, on the presence of any ACMs prior to larger scale refurbishment projects.

### *Refurbishment and Demolition Surveys*

7.30.3 A refurbishment and demolition survey is needed for all work that disturbs the fabric of the building. This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. This type of survey is, of necessity, intrusive and

best carried out when properties are vacant and circumstances allow.

### **Surveying Strategy**

- 7.31 The following strategy will be adopted in compliance with HSG264 Asbestos: The Survey Style Guide.

### **Refurbishment work**

- 7.32 By the nature of this work there is a risk that the fabric of the building may be disturbed.
- 7.33 Therefore Refurbishment/Demolition Surveys need to be undertaken. This work will be based around a planned sampling approach which will be agreed between the Asset Management team, the assigned asbestos consultant and contractor, where surveys will be undertaken.
- 7.34 Where we have individual refurbishment works where there is a risk that the building fabric will be disturbed then again individual refurbishment/demolition surveys will need to be undertaken.

### **Void Works**

- 7.35 When a property becomes void and no asbestos survey information is available, and where works are required, we will undertake a survey of the property to provide a more comprehensive assessment of the location, extent and condition of any asbestos present. Any recommended works would then be carried out by the appropriate contractor, whether this is a licensed contractor or the voids contractor.

### **Responsive Repairs**

- 7.36 The majority of the repairs undertaken through our responsive repair service will utilise the data held within the Asbestos Register to notify the responsive repairs contractor of the likelihood that ACMs are present within individual properties.

### **Common Areas**

- 7.37 Common areas would normally include such areas as foyers corridors, lifts, lift shafts, staircases, boiler houses, vertical risers and shared outhouses.
- 7.38 Each of these areas will be identified from the Asset Management database and if required other sources. A planned programme of management asbestos surveys will be undertaken for each communal area.

### **Risk Assessments**

- 7.39 Both Management and Refurbishment & Demolition Surveys will incorporate risk assessments relating to any ACMs found. The general strategy that will underpin the risk assessments of ACMs, is as follows, the ACM will be removed if it is damaged or in a vulnerable condition or where it could easily be damaged and

allow the uncontrolled release of asbestos fibres.

- 7.40 The management of any asbestos found will be determined by the results which are driven from risk assessments undertaken as part of an asbestos survey. The risk assessment will incorporate a material assessment of any ACMs which will assess the risk of fibre release from the asbestos containing material. If a high or medium risk material is identified, then the decision on whether to remove a high or medium risk material will dependant on the:
- Location of the material
  - Extent of the material
  - Use to which the location is put
  - Occupancy of the area
  - Activities carried on in the area
  - Likelihood/frequency with which maintenance activities are likely to take place.
- 7.41 In summary, a high or medium risk material will be removed if they are damaged or in a vulnerable position where they could be easily damaged, or if the proposed work is likely to disturb them and allow the uncontrolled release of asbestos fibres.

### **Material Assessment**

- 7.42 The parameters on which the material assessments are based will determine the amount of fibre release from an ACM when subject to a disturbance. The four parameters are:
- The product type
  - The extent of damage or deterioration
  - Its surface treatment
  - The asbestos type
- 7.43 The survey findings will be used to establish the priority for those ACMs needing remedial action and the type of action that will be undertaken. The options available will range from protecting or enclosing, sealed or encapsulation, or repaired. These options should be considered first. Where such actions are not practicable ACMs will be removed.

### **Minimum Accreditation for Surveying Asbestos**

- 7.44 As a responsible landlord we will appoint a competent company to undertake our asbestos surveys. In order demonstrate this competency the relevant company will need to have the United Kingdom Accreditation Service (UKAS) accreditation detailed below. Accreditation for asbestos surveys is currently outsourced by the HSE to the UKAS. The accreditation under the scheme comes under ISO/IEC 17020. The survey team should therefore be accredited, and checks can be made via UKAS's website ([ukas.com](http://ukas.com)) which publishes a list of accredited organisations.
- 7.45 Any laboratory will need to demonstrate they carry out the bulk analysis of asbestos analysis in accordance with the requirements of ISO/IEC 17025. Typical

evidence would include; staff training records, certification from external training providers, quality assurance schemes, internal proficiency testing programmes and analysis checks of a proportion of routine samples.

### **Audit of Surveys**

- 7.46 Surveying companies will be expected to audit and quality-check a percentage of surveys in line with HSG 264 and UKAS accreditation.

### **Contractors and Persons Carrying out Work on Premises**

- 7.47 Where works may disturb the fabric of buildings worked in risking asbestos disturbance, the Asbestos Register and asset folder should be checked to determine if suitable and sufficient asbestos survey data is already present. Where information is available, this will be provided to the contractor or relevant individual before works commence. Where information is not available, appropriate surveys will be commissioned and provided to the contractor or relevant individual before works commence.
- 7.48 The Development and Corporate Landlord Property Operations team responsive and out-of-hour contractors will be sent a copy of the asbestos register on a regular basis (subject to volume asbestos information updates). In addition to this the councils' Community Resilience team & out-of-hours call handling contractor will also be provided with the above register in the case of emergency call outs.

### **Informing Tenants**

- 7.49 Tenants must be notified about asbestos which has been found or is likely to be present in their homes which is posing a significant risk. Tenants will therefore be advised of the following:
- Where the asbestos is or is likely to be found
  - What Housing Services proposes to do about it, why and when, if known
  - What the tenants should do to minimise risk
  - Who the tenant/resident should contact in the event that the condition of the material deteriorates
- 7.50 The minimum standard we aim to provide tenants with information available on request and on the councils' websites detailing likely locations of asbestos and what to look out for.
- 7.51 It is an aspiration for information about asbestos present or likely to be present, in the property will be included in the information pack given to new tenants.

### **Response to Queries from Tenants**

- 7.52 The aspiration is to provide general information in the form of letters be provided to tenants regarding the risks and location of asbestos in premises. Where there are reasonable concerns raised regarding significant risks of asbestos in premises, the councils will take action in a reasonable timescale to inspect, assess and address the issue.

## **Accidental Asbestos Release Management Plan**

- 7.53 The asbestos management plan comprises of the actions required to comply with Regulation 15 'Arrangements to deal with accidents, incidents and emergencies' of the Control of Asbestos Regulations 2012 in order to protect the Health of employees, contractors, tenants, residents and the public from an accident, emergency or an uncontrolled release or exposure to asbestos fibres.
- 7.54 In all circumstances, where there is an accidental uncontrolled release of asbestos in any of our homes. The following emergency procedures must come into force in order to prevent or limit the exposure to asbestos fibres:
- In the case of an uncontrolled release of asbestos fibres into the workplace, regulations 15 of the Control of Asbestos Regulations 2012 require all persons either within or in the vicinity of the work area to be kept away from the affected area.
  - Where anybody at risk may have been contaminated with dust or debris the councils will take advice from term consultants and licensed contractors in terms of reducing the risks.
  - Following an assessment, the incident may need to be assessed as being reportable under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).
  - The termed Consultants/ Contractors must respond within a minimum of 4 hours to any Emergency Action.

## **Management Structure**

- 7.55 The councils will ensure that relevant policies and procedures for the management of asbestos are put in place and reviewed annually or when there is a change in legislative requirements.
- 7.56 The Development and Corporate Landlord Operational team will be responsible for the running of day-to-day asbestos issues including:
- Being the point of focus within the Councils for all matters relating to asbestos containing materials.
  - Providing an internal source of information and knowledge on all matters relating to asbestos.
  - Formulating programmes for surveying all dwellings, and for the removal of asbestos containing materials in accordance with this policy.
  - Preparing and administering a term contract for the surveys and removal of asbestos in conjunction with the Housing Compliance team.
- 7.57 The Development and Corporate Landlord Operational team will be responsible for:
- Ensuring the survey data is input accurately to the Asbestos Register.
  - Ensuring that the asbestos register is updated in accordance with this policy.
  - Co-ordinating the procedures for informing tenants of ACMs as detailed within this policy.

## **Training, Awareness & Competence**

- 7.58 All front-line staff that may potentially be exposed to asbestos containing materials during the course of their work will receive asbestos awareness training by a UK Asbestos Training Association (UKATA) or Independent Asbestos Training Provider (IATP) member, or equivalent. The purpose of this training will be to ensure that they are aware of the potential hazards, adopted by Housing Services for working in close proximity to asbestos containing materials. Refresher asbestos awareness training will be provided at least every 12 months or sooner if there has been significant change in legislation. New employees will receive the training within four months of their starting date. The training will be the responsibility of the individual line manager.
- 7.59 The Development and Corporate Landlord Operational team in addition to receiving to the asbestos awareness training, should also be able to demonstrate a good understanding of the current legislation and this policy document. Surveyors will be provided with Asbestos Awareness training at least every year, or sooner if there have been significant changes in legislation.
- 7.60 The Development and Corporate Landlord Operational team will need to have sufficient knowledge and experience to be deemed a competent person. The minimum qualification indicating competency in asbestos management will be the proficiency module P405 & P402 in asbestos management & surveying accredited by the British Institute of Occupational Hygienists (BOHS). Appropriate training will be provided where required.
- 7.61 All contractors employed by Development and Corporate Landlord Operational team to carry out general repairs and maintenance on the housing stock must provide asbestos awareness training for their employees and subcontractors. To ensure reasonable levels of competency, they will be asked to demonstrate, prior to commencing any works that asbestos awareness training has been provided to all people likely to come into contact with asbestos containing materials.

## **Monitoring and Review of the Policy and Management Plan**

- 7.62 Monitoring arrangements will be put in place to ensure that the systems and procedures outlined in this policy and management plan are carried out. This will include:
- Monitoring of the asbestos register to demonstrate compliance as outlined within the policy document.
  - The investigation of all asbestos related incidents and acting on the findings to prevent a recurrence.
  - Routine summary reporting of performance monitoring to the Senior Managers. Where shortfalls in performance are found, the causes must be identified, and the necessary corrective action must be taken at the appropriate management level.
  - Annual management reviews of the Policy and Management Plan will be carried out.
- 7.63 All data pertaining to this policy will be stored and managed in line with statutory

data protection requirements, as outlined in the councils' data protection policy.

## 8. Employment Contractual Status

- 8.1 This policy does not form part of the contract of employment for South Oxfordshire District Council or the Vale of White Horse District Council.

## 9. Communication and Contact Information

- 9.1 For further information about this policy, please contact the Housing team on email: email [tenants@southandvale.gov.uk](mailto:tenants@southandvale.gov.uk) or telephone 01235 422000.

## 10. Alternative Formats

- 10.1 Please do not hesitate to contact the councils if you would like this policy in an alternative format, via email: [tenants@southandvale.gov.uk](mailto:tenants@southandvale.gov.uk) or telephone 01235 422000.

## 11. Definitions

- 11.1 Definitions are as follows:

- ACM: Asbestos Containing Material
- CAR: Control of Asbestos Regulations
- HSE: Health and Safety Executive
- UKAS: United Kingdom Accreditation Service
- BHOS: British Occupational Hygiene Society
- CDM Regulations: Construction (Design and Management) Regulations 2015
- RP: Registered Provider of Social Housing

## 12. Change Record

Change Record	
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