



ASBESTOS POLICY AND MANAGEMENT PLAN

Approved by:	Leadership Management Team
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Policy developed by:	Property Team

1. Introduction

- 1.1 The Asbestos Policy and Management Plan sets out how Hornsey Housing Trust (HHT) complies with the Control of Asbestos Regulations 2012.
- 1.2 The purpose of this policy and management plan is to effectively manage all Asbestos Containing Materials (ACMs), thereby reducing asbestos-related risks to as low as reasonably practicable. It also seeks to ensure that all asbestos works are scoped, delivered and managed in accordance with legal requirements and best practice.
- 1.3 HHT will follow a systematic approach to the management of asbestos to ensure it meets the requirements set out in the Control of Asbestos Regulations 2012 and other relevant legislation. To ensure the health, safety and welfare of employees, tenants, contractors and other stakeholders.

2. Policy

- 2.1 HHT is required to have an Asbestos Policy and Management Plan to ensure everyone who either works for or on behalf of HHT, or who may use any facility provided by HHT is not exposed to asbestos materials or the release of asbestos fibres.
- 2.2 HHT (the duty holder) will protect the health, safety and welfare of its employees, tenants, contractors and visitors by undertaking the following duties:
 - Ensure that all ACMs are effectively managed and associated risks reduced to as low as reasonably practicable
 - Develop and implement an effective Asbestos Management Plan so that appropriate measures including monitoring, labelling, encapsulation, inspection or removal of ACMs are undertaken
 - Maintain a written record of the location and condition of Asbestos Containing Materials (ACMs) known as the Asbestos Register
 - Ensure a standard notification within the works order process, notifying contractors of the presence of ACMs by means of the Asbestos Register
 - Ensure all persons who are required to disturb, repair or remove ACMs are competent and licensed
 - Monitor the condition of ACMs in accordance with survey recommendations
 - Appoint a Responsible Person to co-ordinate the management of ACMs

3. Legal and Good Practice Framework

- 3.1 The Responsible Person will ensure that competent licensed asbestos removal contractors are procured and appointed for licenced and non-licensed (including ~~Notifiable~~ non licenced) works.
- 3.2 HHT will maintain an Asbestos Register and ensure that it is made available to staff, contractors and other stakeholders as appropriate. The Register will incorporate management, refurbishment and demolition (R & D) surveys for each property.
- 3.3 HHT will review existing asbestos management survey information prior to carrying out any responsive, void or planned maintenance works. This is to ensure that any

ACMs likely to cause a risk are identified prior to works commencing and the information is passed to the relevant staff members, contractors or stakeholders.

- 3.4 Where intrusive works relating to refurbishment or demolition are to be undertaken or commissioned by HHT, a Refurbishment and Demolition (R & D) survey will be undertaken.

4. Confidentiality and General Data Protection Regulations (GDPR)

- 4.1 HHT is fully committed to compliance with the requirements of the General Data Protection Regulations (EU) 2016/679 (GDPR), which came into force on 25 May 2018. HHT will therefore follow procedures that aim to ensure that all employees, Board members, contractors, agents, consultants, partners or other persons involved in the work of HHT and who have access to any personal data held by or on behalf of HHT, are fully aware of and abide by their duties and responsibilities under GDPR.

5. Asbestos Management Plan (AMP)

- 5.1 The purpose of the Asbestos Management Plan (AMP) is to assist with the control and management of ACMs in HHT's properties. All properties constructed prior to the year 2000 will be subject to the AMP.

- 5.2 HHT will maintain asbestos asset data by undertaking the following surveys:

- Management surveys on a 3-year cycle of ACMs in communal areas
- Refurbishment & Demolition survey (R & D), on any properties due for major repairs or intrusive work

6. Management Survey

- 6.1 An asbestos management survey is a non-intrusive survey undertaken by a competent person, meeting the criteria specified in Asbestos: The Survey Guide (HSG 264).
- 6.2 The competent person will determine the number of samples necessary in any given room based upon the material, location and professional judgement.

7. Refurbishment and Demolition survey

- 7.1 Refurbishment and demolition surveys are undertaken where significant disruptive works are to be carried out. This will include planned life cycle replacements e.g. kitchens and bathrooms as well as external works where disturbance of the building fabric is likely.

8. Asbestos Register

- 8.1 The Asbestos Register forms the basis of the asbestos management plan. Survey results (including negative results) will be recorded on the Asbestos Register. Where no information regarding ACMs is available e.g. areas that could not be accessed during a survey it will be presumed that ACMs are present.

- 8.2 HHT will not remove ACMs that are in good condition and present insignificant risk to the health of the building occupants.
- 8.3 The Asbestos Register for each address and communal area will note the following information:
- Property address
 - Material type
 - Asbestos type
 - Location
 - Recommendation to remove / monitor / label / manage
 - Risk score
 - Recommended reinspection frequency

Damaged ACMs will be made safe either by sealing, encapsulating or by removal.

- 8.4 The Asbestos Register is held on the shared drive. Information is provided to staff or contractors upon the issue of an instruction to attend. The Register is maintained and updated by the Repairs and Compliance Manager.
- 8.5 Any significant change to the asbestos property information will be accompanied by a new survey and recorded in the Asbestos Register held. Where removal results in there being no ACMs remaining in a property the removal documentation will negate the need for another survey.

9. Duty Holder and Responsible Persons (HHT)

- 9.1 The Board retain overall responsibility and are the Duty Holder for asbestos management within HHT.
- 9.2 In order to support the Duty Holder function, the following Responsible Persons are appointed to carry out these duties:

- **Head of Property**

The post holder has the responsibility to monitor the actions of those reporting to them on matters of asbestos management and to ensure that others are carrying out their duties effectively, and that the measures as detailed in this policy are being implemented.

The Head of Property is also responsible for reporting to the Board on the budgetary requirements for addressing any failings in asbestos management.

- **Repairs & Compliance Manager (R&CM)**

The R&CM is responsible for compliance and ensuring that all policies, procedures and reporting both by HHT and the competent contractor are undertaken in accordance with this Policy.

The R&CM is also responsible for the operational delivery of asbestos compliance, including survey programmes, contractor monitoring and management, register maintenance and reporting and ensuring that all stakeholders understand the asbestos information, risk ratings, access restrictions and required control measures

10. Contractor Responsibility

- 10.1 Contractors (including sub-contractors), working for HHT are responsible for ensuring that all employees under their control reference the Asbestos Register and understand its content and the actions required. They are also responsible for ensuring all employees under their control work in line with HHT's Asbestos Policy and Management Plan.
- 10.2 When during the course of any work, ACMs or material suspected of being ACM, not identified by the Register is discovered the contractor will ensure that:
- All work is stopped in the area
 - All persons are removed and kept out of the immediate area without causing undue concern
 - The area is closed, sealed or locked where practicable
 - Any equipment or materials are left in place. These will require to be disposed of as special waste depending on the results of sampling.
 - Warning notices are to be placed in the area
 - Arrangements are to be made for the suspected ACM to be sampled by a competent asbestos contractor and analysed by a UKAS accredited laboratory.

11. Communicating with the Tenants

- 11.1 Where ACMs are identified, are in good condition and remain in situ, tenants will be provided with an information leaflet in sign-up packs for new tenants or hand delivered to existing tenants where ACMs have been found. The information leaflet will include the following:
- Location of ACM
 - Plans to inspect and manage the material in situ
 - Advice on how to avoid disturbing ACMs

12. On-going monitoring

- 12.1 All ACMs will be inspected by the competent contractor every three years or sooner where risk assessments indicate. This cycle will be amended where the competent contractor advises (based on risk levels), on a more frequent period.
- 12.2 Any changes or removals to the condition and location of any known or suspected ACMs must be recorded on the Asbestos Register.
- 12.3 An annual audit of the Asbestos Register will be completed, including verification of survey data and reconciliation with the Register.

13. Identification of damaged or disturbed suspect material

- 13.1 It is the responsibility of staff and contractors to report to HHT if they suspect that disturbed or damaged ACMs may be present. Where this is suspected the following will apply:

- Immediate contact with a licenced asbestos surveying contractor to identify if the material contains asbestos.
- Where damage to any material known to contain ACM has taken place and is likely to give rise to airborne respirable fibre release, the area will be isolated, pending air monitoring tests being undertaken by a UKAS accredited analyst.
- Remedial action will be required when airborne fibre levels exceed levels as stated in the 2010 Health & Safety Guidance (HSG) 264 guidance
- When remedial action becomes necessary after exposure, a RIDDOR report to the HSE may be required

14. Equality and Diversity

- 14.1 This policy is applied in line with HHT's Equality, Diversity and Inclusion Policy along with the associated legislation including the Equality Act 2010. At HHT we aim to eliminate discrimination, promote equality of opportunity, foster good relations and define the nine protected characteristics of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex, or sexual orientation.

15. Review of the Policy and Management Plan

- 15.1 This Policy and Management Plan will be reviewed every three years, or sooner if required by changes in legislation or guidance considering:
- Legislative, regulatory and good practice requirements
 - Corporate Risk Register
 - HHT Corporate Strategy
 - Continuous monitoring of the effectiveness of asbestos management strategies, especially when construction, refurbishment, or maintenance work is planned