



Loreburn Group

Asbestos Management Policy

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|--------------------------|--|--|------------|---|-----------|--|
| Policy | Asbestos Management Policy | | | | | |
| Version reference | V4 | | | | | |
| Approved by | MC | | LET | X | MT | |
| Date of approval | May 2026 | | | | | |
| Review period | Every 3 Years or as legislation or substantive changes occur | | | | | |
| Review due | May 2029 | | | | | |
| Policy champion | Team Manager – Property Services | | | | | |

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1. Purpose of this Policy

- 1.1. This Policy explains how Loreburn Housing Association will manage the risk posed by asbestos containing materials (ACMs) and materials presumed to contain asbestos at premises owned, managed, or controlled by the Association.
- 1.2. The policy also ensures compliance with the duties placed upon it by the items of legislation detailed in Section 2 of this policy document.
- 1.3. Loreburn will promote good practice and partnership-working in relation to safety relating to asbestos and the associated risks.
- 1.4. This Policy is supported by the Asbestos Procedural Guide.

2. Related Policies, Procedures & Documents

- 2.1. This policy should be read in conjunction with the following Loreburn policies and procedures:
 - Voids Property Management Policy
 - Reactive Repairs Policy
 - Aids and Adaptations
 - Planned Maintenance Policy
 - Cyclical Compliance Policy
 - Risk Management Policy
 - Health & Safety Policy
 - Asset Management Strategy
 - Stock Condition Surveys
 - Building Performance Standards
 - Asbestos Register
 - Asbestos RAMS (IHR)
 - Contract Management and Performance Monitoring Policy and Procedure
 - Adverse Event Policy and Procedure
 - Contractor's Working Arrangement
 - Alterations & Improvements
 - Emergency Procedures
 - Estate Management Policy
 - Personal Protective Equipment Policy
 - Planned & Emergency Decant Policy
 - Risk Flag Policy
 - Waste Management Policy



3. Aims of this Policy

- 3.1. Through this policy we aim to establish procedures to ensure compliance with respective legislation and guidance and protect the health, safety and welfare of our customers, employees, contractors and visitors.
- 3.2. To promote effective communication with all stakeholders and partner agencies by ensuring Asbestos information is issued with all relevant work orders.
- 3.3. To achieve continuous improvement overall by setting annual targets for completion of asbestos surveys, monitoring targets and improving performance where practicable.
- 3.4. To implement processes in an efficient manner and ensure the overall approach meets the provisions of the Association's Health & Safety Policy and Risk Management Policy.
- 3.5. To ensure respective services are procured in line with the Association's Procurement and VFM Strategy, Procurement Policy, Financial Regulations and Standing Orders.
- 3.6. To have a system in place for prioritising surveys/re-surveys. For example, planned maintenance works. Utilising Loreburn's Housing Management System which holds all Asbestos information.
- 3.7. To gain feedback from customers, via satisfaction surveys sent out annually and contractors via monthly contractor meetings to help improve the service
- 3.8. To regularly update Loreburn Executive Team, Health & Safety Executive Committee and Management Committee on performance

4. Legislative Background

- 4.1. Asbestos is a naturally occurring fibrous material used in a large range of building materials and products. When materials that contain asbestos are disturbed or damaged, fibres are released into the air. When these fibres are inhaled, they can cause fatal serious diseases, for example Mesothelioma, Asbestos-related lung cancer, Asbestosis, Pleural thickening.
- 4.2. Further information is available from <http://www.hse.gov.uk/asbestos/dangerous.htm>



4.3. In preparation for this Policy, we have taken account of:

- Health and Safety at Work Etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Control of Asbestos Regulations 2012
- The Workplace (Health, Safety and Welfare) Regulations 1992
- Construction (Design and Management) Regulations 2015
- “Managing and working with asbestos” – Control of Asbestos Regulations 2012 L143 (second edition) Published 2013
- The HSE Guidance Note, Asbestos: The survey guide” HSG 264 2nd Edition, 2012
- HSG248 Asbestos: The Analysts’ guide for sampling, analysis and clearance
- The HSE Guidance Note “A comprehensive guide to Managing Asbestos in premises HSG227”
- An HSE Task Manual: Asbestos Essentials HSG 210 4th Edition 2018
- For further information <http://www.hse.gov.uk/asbestos/>

5. How we will achieve our Aims & Objectives

5.1. The three types of asbestos surveys are detailed below:

5.1.1. **Management Survey** - A survey carried out to access all areas of a property as far as is reasonably practical in order to establish if asbestos is present. This type of survey would be carried out if maintenance works/repairs are not deemed to be major/invasive refurbishments. This is normally a visual survey. The Association currently has Management Survey Programme in place to achieve 100% Management Surveys of its stock built before 2000. The Property Services Officer managing the contract is responsible for ensuring these are updated. Support from the Property Services Administration Assistant can be utilised. These Management Surveys will be completed by an external contractor appointed by the Property Services Team via a competitive tender. The contractor will ensure that target figures are achieved annually. This will be monitored via Loreburn’s Health & Safety Executive Group. This is considered as best-practice.

5.1.2. **Re-Inspection Survey** - A survey carried out every 12 months to monitor and record the condition of any asbestos products previously identified within a building. These 12-month surveys will be completed by an external contractor appointed by the Property Services Team via a competitive tender. This contractor should ensure Re-Inspection Surveys are received no later than 3 weeks prior to the current certificate expiration date. The Property Services Officer managing the contract is responsible for ensuring these are updated. Support from the Property Services



Administration Assistant can be utilised. This will be monitored via Loreburn's Health & Safety Executive Group. This is a legal requirement. An Asbestos Register of addresses where re-inspections are completed, and the location of the ACMs can be found on the 'Property Services' Intranet page. This list is monitored and updated by the Property Services Officer and Team Manager – Property Services.

- 5.1.3. **Refurbishment/Demolition/Targeted Survey** - A targeted survey to a specific area where work will be undertaken. This survey is fully intrusive to access all required areas of the building where major refurbishment or demolition works are to take place. This type of survey is required even if a management survey has already been carried out and refurbishment/demolition is due to take place. The Property Services Officer responsible for any work requiring this survey will be responsible for instructing and receiving the certification.

- 5.2. An Asbestos Register is held on the Housing Management System. Information includes where Asbestos Containing materials have been identified, the last inspection date and a copy of the asbestos certification.

6. Repairs and Planned Works

- 6.1. The Association is committed to providing sufficient information with respect to asbestos to allow their operatives and contractors to work safely and without risk to health.
- 6.2. The responsibilities for asbestos management within this relationship are:
- Provision of Asbestos information is the primary responsibility of the Association.
 - It is the responsibility of the Association to notify IHR of the upcoming review of the procedure.
 - It is the responsibility of contractors (including IHR) to advise the Association of any issues regarding the procedure.
- 6.3. It is the responsibility of the Association to provide information to all stakeholders from the programme of management and reinspection asbestos surveys that have been undertaken. These are surveys that have been targeted at parts of the structure where reactive maintenance is anticipated and include,



but not be limited to:

- Services and utilities (electricity, water, drainage, gas etc.) with respect to their entry into and distribution around the property (inclusive of kitchens, bathrooms, under floor and attic distribution).
- Glazing (mastics and putties etc. to windows and doors which may require immediate work during replacement of windows, not including around frames which would be the subject of non-immediate work).
- Domestic premises as make relevant by Section 3 of the Health & Safety at Work Act
- Doors, particularly any fire boards etc.
- Common areas

7. Staff Training and Development

- 7.1. The successful implementation of the policy and supporting procedures is dependent on the knowledge and skills of staff implementing it.
- 7.2. Regular training will be provided to relevant staff to ensure a consistent approach and ensure they are carrying out the roles and duties linked to the application of this policy.
- 7.3. Training will be completed as detailed below:

| Job Roles | Training Required | Frequency |
|--|--|-----------|
| All Frontline Staff | Asbestos Awareness via Online E-Learning | Annually |
| Staff responsible for Managing Contractors who may work in pre-2000 properties (Asset Management Team) | Asbestos Awareness UKATA or IATP Approved training | Annually |
| Staff who may work in pre-2000 properties (In House Repair's Operatives) | Asbestos Awareness UKATA or IATP Approved training | Annually |

8. Responsibility Chart

- 8.1. The chart below illustrates the responsibilities of all staff pertaining to this Policy:

| Responsibilities | CEO | LET | Management Team | Team Manager | All Staff |
|--|-----|-----|-----------------|--------------|-----------|
| To set the policy and direction with regards to Asbestos | ✓ | | | | |



| Responsibilities | CEO | LET | Management Team | Team Manager | All Staff |
|--|-----|-----|-----------------|--------------|-----------|
| Ensure Loreburn staff have a robust understanding of Asbestos and the associated risks | | ✓ | | | |
| Manage service, reporting and update H&S Executive Group quarterly | | | ✓ | ✓ | |
| Take lead on applications, make day to day decisions | | | | ✓ | |
| Policy Champion | | | | ✓ | |
| Ensure effective and clear communication with key stakeholders including customers | | | ✓ | ✓ | |
| Reporting concerns to Line Manager | | | | ✓ | ✓ |
| Participate in meetings and provide evidence for investigations as required | | | | | ✓ |
| Ensure complaints feedback is used to improve service | | | ✓ | ✓ | |
| Working with Head of P&C to ensure staff have appropriate training | | | ✓ | ✓ | |
| Ensure policy is reviewed annually or as necessary | | | | ✓ | |

9. Measuring Performance

- 9.1. Performance is monitored through Loreburn’s Performance Management Framework using the Scottish Housing Regulator Annual Return Charter Indicators, House Mark and Loreburn HA’s Strategic Performance Indicators and operational performance indicators.
- 9.2. Loreburn will consult customers, stakeholders, and other agencies to continually measure good practice.
- 9.3. Performance, in regards to completion of Asbestos Certification and recording of instances of Asbestos, will be monitored via Loreburn’s Health & Safety Executive Group.
- 9.4. Contractor Performance, in regards to delivering Asbestos Management Programme, will be monitored via Loreburn’s Contractor Management and Performance Monitoring Policy & Procedure and via reports submitted to Loreburn’s H&S Executive Group quarterly.
- 9.5. The Policy will adhere to Loreburn’s commitment to continuous improvement



and value for money.

10. Complaints

- 10.1. Loreburn is committed to valuing complaints and ensuring the organisation benefits from feedback provided.
- 10.2. Loreburn is fully compliant with the Model Complaints Handling Procedure set by the Scottish Public Services Ombudsman (SPSO). Any complainant that has exhausted internal procedures has the right to escalate their complaint to the SPSO.

11. Equality, Diversity & Inclusion

- 11.1. Loreburn aims to ensure that equality, fairness, dignity and respect are central to how tenants are treated. Loreburn support diversity and uphold equal opportunities in all areas of work, as an employer and service provider.
- 11.2. Loreburn will not discriminate against tenants, staff, visitors or others based on their age, sex, sexual orientation, race, disability, religion or belief, marital status, pregnancy and maternity or gender reassignment (collectively referred to as 'protected characteristics' in the Equality Act 2010).

12. Policy Review

- 12.1. The Policy Champion is Team Manager – Property Services
- 12.2. This policy will be reviewed every 3 years or sooner due to legislative or substantive changes occurring.

