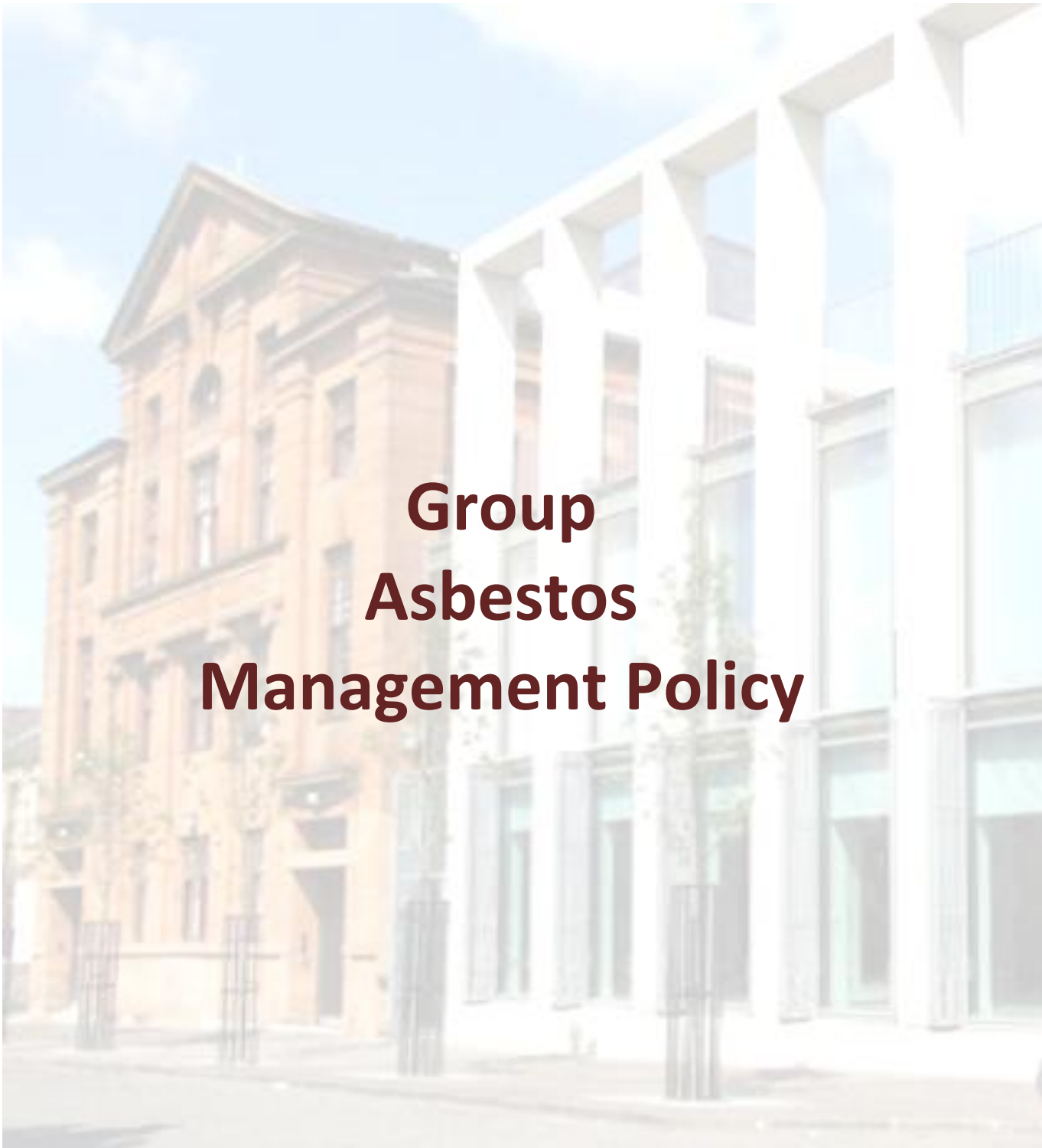


A background image showing a row of houses. On the left is a traditional red brick house with a gabled roof and multiple windows. To its right is a modern white house with large glass windows and a flat roof. The image is slightly faded to allow the text to be read clearly.

# Group Asbestos Management Policy

Approved: May 2026

## **Shettleston Housing Group**

### **Shettleston Housing Group (SHG) comprises:**

#### **Parent :**

##### **Shettleston Housing Association Limited (SHA)**

- Registered Scottish Charity, No. SC036687
- Registered with the Scottish Housing Regulator under the Housing (Scotland) Act 2010, No. 183
- Registered under the Co-operative and Community Benefits Act 2014, Registered No. SP1884RS
- Property Factor Registered No. PF000226
- Authorised by the Financial Conduct Authority, No. FRN730115

#### **Subsidiary Companies :**

##### **Upkeep Shettleston Community Enterprise Limited (Upkeep)**

- Company Registration No. SC277511 (Scotland)

##### **East End Housing Development Company Limited (EEHDC)**

- Company Registration No. SC293302 (Scotland)

### **Our Vision, Mission Statement and Values**

#### **Vision Statement**

*Thriving and prosperous local communities where all residents enjoy great homes and services, an attractive physical environment, and good life chances.*

This statement is the foundation for Shettleston Housing Association's commitment to its residents and the communities they live in. This commitment is also demonstrated in the Association's values which were agreed following discussions with the Board and staff. Shettleston's values are fundamental to how we carry out our day-to-day activities.

Our values are:

**Customer service | Make a difference in the community | Teamwork | Fairness**

#### **Equality & Diversity Statement**

We will ensure that this strategy is applied fairly and consistently. In implementing this strategy, we will not directly or indirectly discriminate against any person or group of people because of their race, religion/faith, gender, disability, age, sexual orientation or any other grounds. Our commitment to equal opportunities and fairness will apply irrespective of factors such as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, or other personal attributes.

This strategy and any other SHG publications is available in other formats e.g. other languages, Braille, large print, audio.

# Asbestos Management Policy

## 1. Purpose

This policy sets down Shettleston Housing Group's (SHG's) approach to managing the risk of any asbestos containing materials in its properties and should be read in conjunction with the Asbestos Management Plan.

The Asbestos Management Policy and Management Plan apply to all SHG owned buildings constructed prior to the year 2000 (the use of asbestos was banned in the UK in 1999). The terms and guidance in these documents are relevant to all staff employed by SHG, to contractors/subcontractors engaged by the organisation and to tenants and occupants of SHG premises.

## 2. Introduction

Under the Control of Asbestos Regulations (CAR) 2012 SHG has a duty to manage asbestos in its non-domestic premises, including common areas within residential blocks. There is no legal duty to manage asbestos within domestic properties. However, SHG has a duty of care to ensure its homes are safe and fit for habitation and recognises that, if disturbed, asbestos containing materials can have a significant detrimental effect on occupant health. Further, when work is undertaken in homes these become workplaces for contractors and SHG does have a legal duty to manage asbestos in the workplace. This means that SHG must have measures in place to manage asbestos in all of its properties.

This policy aims to ensure that, as far as is reasonably practicable, no persons are exposed to risks to their health due to exposure to asbestos containing materials that may be present in SHG owned properties.

It should be noted that the presence of an asbestos containing material (ACM) in itself does not constitute a danger. However, there is a potential risk to health if such material is disturbed and damaged. An isolated accidental exposure to asbestos fibres for a short duration is extremely unlikely to result in the development of asbestos related diseases. However, regular exposure – even at relatively low levels – can present a risk. This can affect residents as well as people employed in the building trades, including those undertaking maintenance and repair contracts. It is important, therefore, to have a management system in place that minimises the potential for exposure to asbestos.

## 3. Key Principles

SHG aims to take all necessary measures to ensure full compliance with CAR 2012. This includes the duty to manage any asbestos-containing materials (ACM) in such a manner as to prevent the exposure of employees and building users to asbestos or, where this is not practicable, to reduce exposure to the lowest possible level. These objectives will be achieved by:

- Ensuring SHG recognises which properties are covered by Regulation 4 of CAR 2012 where there is a legal duty to manage asbestos in non-domestic buildings. And for all applicable non-domestic properties ensure these are appropriately surveyed and managed.

- Ensuring that any asbestos containing materials that may be present in any of its buildings (domestic & non-domestic) are recorded, assessed and maintained in a condition so as to prevent the possibility of any harm to health occurring.
- Promoting awareness of the risks from asbestos containing materials through training and induction of relevant staff. Key staff involved in the delivery of this Policy will receive annual refresher training.
- Ensuring compliance with all relevant asbestos legislation, approved Codes of Practice, Health and Safety Executive Guidance Notes and commitment to the safe disposal of any asbestos waste in accordance with the appropriate legislation.
- Ensuring that an appropriate asbestos surveying process remains in place, taking account of the need for Asbestos Management, Refurbishment and Demolition Surveys in accordance with current legislation.
- Ensuring a robust Asbestos Register of SHG stock is continually developed and maintained.
- Implementing effective asbestos management procedures in order that appropriate measures such as encapsulation, labelling, inspection, working with, or removal of, the material can be undertaken.
- Ensuring that an appropriate data management system is installed, maintained and implemented for the management of all asbestos containing materials identified in the Register. Such a system will be capable of recording the risk, the needs and priorities for treatment and/or removal.
- Ensuring all Contractors and sub-Contractors engaged to carry out work on any of the Association's buildings are provided with adequate information on any asbestos that may be disturbed by their works.
- Ensure that information regarding the presence of asbestos is contained in tender documentation as may be appropriate.
- Ensuring competent Licensed Contractors and/or Sub-Contractors carry out **ALL** Asbestos Works.
- Ensuring that relevant SHG staff and contractors have a clear understanding of the requirements of the Policy and Procedures set down in the Asbestos Management Plan.

#### **4. Legal & Best Practice Framework**

The management of asbestos containing materials is covered by the following legislation and best practice guidance:

- Health and Safety at Work etc. Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Control of Asbestos Regulations 2012
- The Construction (Design and Management) Regulations 2015

- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR 2013)
- The Workplace (Health, Safety and Welfare) Regulations 199
- Personal Protective Equipment at Work Regulations 1992
- Environmental Protection Act 1990 Amendment (Scotland) Regulations 2019
- The Special Waste Amendment (Scotland) Regulations 2004
- L143: Managing and working with asbestos (ACOP)
- INDG 223 Managing Asbestos in Buildings: A Brief Guide
- HSG264 Asbestos: A survey guide
- HSG248 Asbestos: The Analysts' Guide
- HSG227 A comprehensive guide to managing asbestos in premises

## 5. **Roles & Responsibilities**

SHG's Board of Management has overall responsibility for the oversight of the maintenance and management of homes and non-domestic premises to ensure compliance with resident safety and more general health & safety requirements across the organisation. It is important that the Board has a good level of assurance about the effectiveness of the management of asbestos containing materials in its premises. This is achieved through operational oversight of these issues that is delegated to the Operations sub-Committee (for Association managed properties); EEHDC Board (for mid-market and private rented homes managed by EEHDC) and Upkeep Board (in connection with safety of the workforce).

The Chief Executive has overall responsibility for the management of health and safety across SHG and has oversight of the policy and procedures relating to asbestos management. The CEO will, in conjunction with the Duty Holder, monitor performance on issues arising in connection with ACMs to ensure standards are being met.

The Director of Property Services (DPS) is the Duty Holder who holds legal responsibility for oversight and implementation of the asbestos management systems within SHG. The Duty Holder is the person who, by virtue of a contract or tenancy agreement, has an obligation to maintain or repair the premises covered. The DPS, therefore, acts as Duty Holder in respect of the properties owned by SHG, other than those let to a third party on a full repairing and insuring lease (where the duty rests with the tenant).

The DPS has a responsibility to ensure that SHG carries out its duties with regard to the Control of Asbestos Regulations 2012 and will ensure that policies and procedures are established and maintained that, as far as possible, will protect building occupants and those working within them from potential harm from asbestos materials.

The DPS will ensure that all staff and Board members within SHG are aware of their responsibilities and the responsibilities of others under the terms of the CAR 2012.

The Property Services Manager (PSM) acts as Asbestos Co-ordinator and has delegated authority for the day-to-day operation of the Asbestos Management Policy and Plan, including monitoring adherence to these by SHG staff and contractors.

Upkeep's Head of Operations (HOp) has a responsibility to ensure all Upkeep staff maintain an awareness of the risks associated with asbestos materials and will monitor adherence to the Asbestos Management Policy and Plan by Upkeep staff.

All SHG staff have a responsibility to ensure they remain alert to the risks presented by ACMs in premises and follow the approved policy and procedures. It should be noted that individuals may face prosecution if they put themselves, another staff member or a contractor at risk by disregarding training, advice and /or procedures.

Full details of roles and responsibilities, including SHG's chain of responsibility, are set down in the Asbestos Management Plan.

## **6. Communication**

CAR 2012 requires that all employers must ensure that employees who are liable to be exposed to ACMs are provided with appropriate information, instruction and training.

Information on ACMs, including survey reports, risk assessments and management actions is stored on SHG's central database and available to all staff. This information is made available to consultants and contractors working within SHG properties (including the out of hours contractor) and shared with the emergency services as required.

Any properties that do contain ACMs or suspected ACMs are flagged on SHG's property management system. This ensures that an assessment can be undertaken on whether works would disturb the ACM when raising a repair order. Where this is the case a specialist contractor must be appointed. Information on the location and type of the ACM will be provided within the repair order to ensure the contractor is aware of any potential risk.

SHG will notify building occupants of the presence of any ACMs in their property, along with an explanation of any risk posed to them if the material is disturbed.

In non-domestic premises consideration will be given to labelling any ACMs as part of the risk assessment and review of management actions in order to highlight the potential risk to building users and contractors.

## **7. Training**

All SHG staff involved in the maintenance of buildings will be required to undertake annual asbestos awareness refresher training. Those staff involved in the oversight and management of asbestos will be required to undertake appropriate training on asbestos management. A record of training needs and attendance will be retained by the PSM and HOp and updated annually as part of the review of the Asbestos Management Plan.

All work to be carried out on licensable asbestos material will involve the use of an HSE licensed contractor and they will be required to provide evidence of competence and relevant training of all operatives prior to undertaking work on SHG premises. Detailed requirements for this are included in the Asbestos Management Plan.

## **8. Assessment of Stock & Asbestos Register**

SHG has a duty to ensure that a suitable and sufficient assessment is undertaken of its stock to determine whether asbestos is or is liable to be present. The first step of this assessment process was an initial examination of the property stock, taking into account such factors as building age, type and use, together with an assessment of any existing property records. This initial assessment provided the priority for completing asbestos management surveys of those properties deemed to be likely to contain asbestos.

A programme of asbestos management surveys has been carried out by competent UKAS accredited consultants on SHG owned premises built or renovated prior to 2000 (HSE expects that no asbestos containing materials would be in use from 2000.) For non-domestic properties and common areas of domestic premises surveys will continue to be undertaken to ensure all properties have up to date inspections for ACMs.

Representative sample surveys have been undertaken in domestic premises constructed or renovated prior to 2000 and SHG will continue to augment this survey database to improve knowledge of domestic properties. It should be noted that Regulation 4 of CAR 2012 does not subject 'domestic dwellings' to the requirement for Asbestos Management Surveys. However, SHG has a duty of care to protect residents from potential harm from ACMs and a legal duty to protect workers when undertaking repair and maintenance works in its properties. In domestic properties an appropriate strategy will be determined jointly by SHG and the surveyor to cost-effectively assess relevant premises, taking account of the permissibility of 'representative' surveying across domestic properties of the same archetype and construction date until consistent information is secured to provide a robust dataset for each type and clarify the risk.

The findings of all surveys are used to prepare and maintain a central register of asbestos containing materials for all relevant premises. This Asbestos Register includes the location and condition of ACMs, along with a risk assessment that considers the material type and condition and the likelihood of disturbance and details on how best to manage / remediate the material.

Where properties are surveyed and found to be free of asbestos this will also be recorded in the Asbestos Register to ensure clear information and provide reassurance for building occupants and contractors working in these premises.

An Asbestos Management Plan has been developed and implemented to ensure that all asbestos containing materials are properly risk assessed, monitored and managed. This includes procedures for re-inspecting materials; carrying out remedial works where necessary; and actions to take in the event of an emergency incident.

The Asbestos Co-ordinator will be responsible for maintaining the Register, reviewing risk assessments, updating the Management Plan, organising surveys and re-inspections, and sharing data as required with contractors and building occupants.

## **9. Risk Assessment**

Regulation 4 of CAR 2012 sets down the requirement to undertake an assessment of the risk of exposure of persons to asbestos fibres. The assessment of risk utilises the results of the Material Assessment Score (MAS) for the identified ACM. This is provided by the specialist UKAS accredited surveyor within the asbestos survey report.

The priority for management of ACMs is determined by assessing the likelihood of those materials being disturbed. This priority assessment must take into account such factors as maintenance activities, likelihood of disturbance, human exposure potential and occupant activity and enables the production of a Priority Assessment Score (PAS) for management. This scoring is determined by SHG using its knowledge of the building use and occupancy. The full assessment of risk of exposure must include both the MAS and PAS for each type of ACM identified.

The material and priority risk assessments for ACMs will be included within the Asbestos Register and inform decisions on priority of management actions. All risk assessment scoring will be periodically reviewed to ensure it remains valid. For example, ACMs in an unoccupied area may have a low risk assessment score. However, this area may subsequently become occupied and a re-assessment of both the PAS and full risk assessment will be required. This re-assessment will be undertaken as part of an annual review.

## **10. Working in SHG Properties**

Before any work is carried out on the fabric of pre-2000 buildings, the Asbestos Register will be interrogated to determine whether ACMs are known or suspected to be present and appropriate precautions will be taken, including the use of HSE licensed contractors where necessary. This assessment is informed by flags on the property maintenance database and SHG staff knowledge of the age and condition of premises.

Following reasonable assessment if doubt remains over the content of the materials that will be disturbed then staff will work on the principle that asbestos may be present and instruct sampling of the material prior to issuing a repair order. Where the sampling shows the presence of ACMs then a licensed contractor will be appointed to undertake the repair. The results of any sampling undertaken will be added to the database and, where appropriate, extrapolated across property records for units of the same type and age. Where the assessment shows works are not expected to disturb ACMs a general maintenance contractor will be instructed, in line with the Maintenance Policy & Procedures.

Prior to any refurbishment, demolition or significant repair works on building fabric, which is not known to be asbestos free, a competent UKAS accredited asbestos management consultant will be commissioned to carry out a 'Refurbishment or Demolition' (i.e. intrusive) asbestos survey of the area to be worked on. A detailed scope will be agreed and the surveyor and SHG will jointly determine an appropriate strategy to cost-effectively assess relevant premises, taking account of the permissibility of representative surveying until the information is consistent and the risk is clear.

**Prior to works starting**, the information obtained from Refurbishment/Demolition Surveys will be shared and discussed with the proposed works contractor to ensure that ACMs will not be disturbed by their works. In the event that works would have the potential to disturb ACMs, appropriate measures will be taken, including the prior removal of ACMs by a specialist licenced contractor.

Records of all surveys and risk assessments will be added to the Asbestos Register. A record of discussions with contractors and actions taken will be retained in the Project file to demonstrate that asbestos was properly considered and appropriate actions taken to prevent disturbance and exposure.

When SHG tenants wish to undertake works or alterations they are required to seek advance permission from SHG before starting any works that will interfere with the fabric and/or services of the building. Before issuing permission staff will consult the Asbestos Register and, where ACMs are identified within the proposed work zone, liaise with the tenant to ensure all appropriate actions are taken. Where the asbestos data is inconclusive – for example, where a Refurbishment Survey has not been carried out - the Association will review the request and decide whether to refuse permission or to arrange for a Refurbishment Survey to be undertaken.

In the event that tenants' works are expected to disturb ACMs, SHG will require works to be completed by a licenced asbestos contractor who will be required to provide all relevant evidence of competency and follow up reports as set down below.

## **11. Work with Asbestos Containing Materials**

Legislation stipulates that most work likely to disturb or remove asbestos must be carried out by an HSE licensed asbestos removal contractor and notified to the HSE 14 days prior to commencement. However, CAR 2012 does allow work with certain lower risk ACMs (e.g. asbestos cement and asbestos textured coatings) to be carried out by non-licensed personnel and without notification to the HSE.

The three categories of asbestos work detailed in the legislation are:

- **Major Works: Licensed works** – 14 day notification and licenced contractor (highest risk work)
- **Minor Works: Notifiable non-licensed works** – notification before works start and competent (non-licensed) contractor.
- **Minor Works: Non-notifiable non-licensed works** – no notification and competent (non-licensed contractor).

Where work does not require to be carried out by licensed contractors (i.e. Minor Works) it must, nevertheless, be undertaken in a safe manner, by appropriately trained personnel, reducing the generation of airborne dusts to as low a level as is reasonably practicable. All method statements and risk assessments for such work must be screened by a competent person prior to work commencing.

The HSE flowchart at **Appendix 1** shows the decision-making process on appropriate classification of works.

**In order to minimise potential risk to building occupants and contractors SHG has taken the decision to employ only specialist licenced asbestos contractors to undertake works to any ACMs or suspected ACMs within its properties.**

Detailed information confirming the specialist contractor's competence and training for working with asbestos will be sought prior to appointment.

At the conclusion of all asbestos works a UKAS accredited Asbestos Analyst will be appointed to carry out the required level of inspection and testing. For licensed works this will include a '4-stage clearance test' and for minor works this will include a visual inspection and reassurance air test. Ideally this testing will be undertaken and certified by an organisation independent from the contractor completing the works.

Unless properly trained to do so and certified competent, SHG staff will not be permitted to handle or work on asbestos containing materials. In the event that SHG opts to handle ACMs in the future (e.g. for the purposes of sampling), appropriate training must be provided, insurances obtained and procedures developed to meet legal and best practice requirements.

## **12. Discovery of Suspected ACMs**

There may be occasions where a non-licensed contractor or staff member discovers an ACM, or suspects a material contains asbestos, during the course of an inspection or repair. In these cases work must stop immediately and the Duty Holder or Asbestos Co-ordinator must be informed so that the material can be assessed and tested before work can re-commence.

It is the responsibility of all staff and contractors working in SHG premises to report to the Duty Holder of Asbestos Co-ordinator if they suspect that disturbed or damaged ACMs may be present in a building owned or occupied by the organisation. In a case where an accessible material is suspected of containing asbestos, and where this material may reasonably *become* disturbed, this would also apply. Staff and contractors must follow the Emergency Incident Procedures set down within the Asbestos Management Plan if they discover ACMs or suspected ACMs in the course of their work.

## **13. Monitoring and Review**

Monitoring of the condition of visible asbestos containing materials will be carried out via the quarterly close inspections and during any property maintenance inspection carried out by Maintenance Officers. Any ACMs in non-domestic premises owned by SHG will be inspected annually. Any changes in condition or likelihood of disturbance will be recorded on the register and a re-assessment of risk and required actions will be undertaken by the Asbestos Co-ordinator.

Where non-domestic properties are let under a full insuring and repairing lease the responsibility for regular inspection and the assessment and management of asbestos risk rests with the tenant.

The Asbestos Management Policy & Management Plan will be formally reviewed by the Operations sub-Committee and Upkeep & EEHDC Boards every three years. The Asbestos Management Plan will be reviewed and updated as required in the interim to take account of relevant changes in legislation and best practice; the outcome of any sampling or works to ACMs; and the review of material condition and priority assessment scoring.

#### **14. Related Documents**

This policy should be read in conjunction with the following related documents:

- Group Asbestos Management Plan
- Maintenance Policy
- Code of Conduct for Contractors
- Construction Design & Management Policy
- Procurement Strategy
- Procurement & Tendering Procedures
- Group Asset Management Strategy

## Decision making process for the classification of asbestos related work

a0 – Introduction to Asbestos essentials

Health and Safety  
Executive

## Decision flow chart

