



NLM Housing Association

Asbestos Policy

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Introduction

- 1.1 NLM has a responsibility to ensure that asbestos containing materials within our properties are properly identified, risk assessed and managed.
- 1.2 The dangers of exposure to asbestos are well documented. Asbestos fibres and dust are potentially very dangerous to people's health if inhaled. This can lead to serious respiratory diseases including cancer. Unfortunately, the symptoms of these diseases can lay undetected before appearing for anything up to forty years after the initial exposure to asbestos.
- 1.3 NLM is committed to safeguarding the health, safety and wellbeing of everybody living, working or visiting our buildings, and to protecting our property.
- 1.4 This policy sets out the asbestos management standards for all assets, including housing stock, offices, and other buildings for which NLM has responsibility (as defined by the lease).

2 Regulatory Standards, Legislation and Codes of Practice

2.1 NLM's asbestos management arrangements must comply with:

2.1.1 Regulator

- Regulatory framework and consumer standards (Home Standard) set out by the Regulator for Social Housing

2.1.2 Legislation

- Control of Asbestos Regulations (CAR) 2012

2.1.3 Codes of practice

- ACoP L143 – Managing and Working with Asbestos
- HSG264 – Asbestos: The survey guide
- HSG248 – Asbestos: The analyst guide to sampling, analysis and clearance procedures
- HSG247 – Asbestos: The licensed contractors' guide
- HSG227 – A comprehensive guide to managing asbestos in premises
- HSG210 – Asbestos Essentials – A task manual for building, maintenance and allied trades and non-licensed asbestos work

2.1.4 This policy also operates in the context of:

- Health & Safety at Work Act 1974
- The Management of Health & Safety at Work Regulations 1999
- The Workplace (Health Safety & Welfare) Regulations 1992
- Personal Protective Equipment at Work Regulations 1992

- Hazardous Waste (England and Wales) Regulations 2005
- Control of Substances Hazardous to Health (COSHH) Regulations 2002
- Homes (Fitness for Human Habitation) Act 2018
- Landlord and Tenant Act 1985
- Construction, Design and Management Regulations 2015
- Defective Premises Act 1972
- RIDDOR 2013

2.2 Sanctions

Failure to discharge these responsibilities in full could result in prosecution, unlimited fines, and/ or a serious detriment judgement from the Regulator for Social Housing.

3 Requirements

3.1 NLM is a 'Duty Holder' as defined within Regulation 4 of the Control of Asbestos Regulations, 2012.

3.2 As a Duty Holder, NLM has the responsibility to:

- identify asbestos within non-domestic (communal) and commercial properties that are owned and/ or managed by the organisation.
- assess the condition of the asbestos found
- keep an up-to-date record of the location and condition of all asbestos containing materials
- assess the risk posed by the asbestos containing materials
- prepare a plan that sets out in detail how the organisation will manage the risk from the asbestos containing materials
- review and monitor the management plan and arrangements
- establish a system for providing anybody who may disturb asbestos containing materials with information on their location and condition
- those who are not duty holders, but control access to the organisation's homes or buildings, have to co-operate with the organisation in managing the asbestos present

4 Delivery

4.1 Asbestos programmes are delivered through competent external contractors (UKAS accredited).

4.2 Contracts are regularly reviewed and retendered in line with the organisation's policies.

4.3 In order to meet requirements and ensure safety NLM will:

- ensure that all non-domestic (communal) and commercial properties owned and/ or managed by the organisation have an initial asbestos management survey carried out
- Re-inspect all non-domestic (communal) properties annually, 6 monthly or by the re-inspection date established in the Asbestos management plan.
- review existing asbestos management survey information prior to carrying out any void repairs, day to day repairs or planned maintenance works
- where information is not held, undertake surveys in domestic properties built before 2000 ahead of void repairs, day-to-day repairs or planned maintenance work
- Prior to any repairs orders being carried out, our repairs system (SDM) will issue a pop-up notice when a property is built before 2000 and therefore presumed asbestos.
- undertake an intrusive refurbishment survey to domestic and non- domestic properties before destructive planned maintenance works take place
- provide staff and contractors with the asbestos information needed to enable safe working
- ensure that relevant staff are sufficiently trained to understand the risks posed by asbestos containing materials and how to mitigate them
- provide residents with information and advice on asbestos containing materials

4.4 Until otherwise stated, all materials found within NLM's properties must be presumed to contain asbestos and treated as such until adequate information is received to the contrary.

4.5 Asbestos materials that have been identified as sound, undamaged and not releasing fibres can remain 'in situ' as long as they are not likely to cause a health hazard to the public especially in domestic or communal areas.

4.6 NLM accepts that asbestos is likely to be present in some of its properties built prior to the year 2000 and will therefore manage these properties accordingly.

4.7 NLM will not:

- survey or inspect non-domestic (communal) or commercial properties built after the year 2000
- survey or inspect properties where the initial asbestos management survey confirms that no asbestos is present, unless a Refurbishment & demolition (R&D) survey is needed before intrusive work.

5 NLM Asbestos Re-Survey Strategy

5.1 Strategic Objective

To ensure all properties with identified asbestos-containing materials (ACMs) are regularly re-inspected, monitored, and managed in compliance with legal obligations and best practice, safeguarding residents, staff, and contractors.

5.2 Survey Frequency and Time Scales

Annual Re-Inspections: All properties must undergo annual asbestos re-inspections, or as per the re-inspection date set in the NLM Asbestos Management Plan.

5.3 Survey Types and Methodology

5.3.1 **Visual Inspections:** Used during stock condition surveys to identify visible ACMs

5.3.2 **Technical (Intrusive) Surveys:** Conducted during decarbonisation or **Survey Triggers:**

- Scheduled annual re-inspections.
- Prior to major works or refurbishments.
- Following reports of damage or deterioration.

5.3.3 **Domestic Properties:** Properties built before 2000 should be surveyed prior to any void repairs, day-to-day repairs, or planned maintenance

5.3.4 **Stock Condition Survey Integration:** Asbestos checks are embedded within the broader stock condition survey programme, which operates on a rolling three-year cycle

5.4 Follow On Works

5.4.1 NLM will ensure that there is a robust process in place for managing any follow on works arising from the asbestos management programmes.

5.4.2 Where there is any doubt as to the composition of the material uncovered, a sample will be taken and analysed in order to facilitate the instruction of remedial works where required.

5.4.3 Asbestos containing materials that are found to be in a poor condition or that are likely to be easily damaged or regularly disturbed will be repaired, protected, or removed at the earliest opportunity.

5.4.4 Where an asbestos containing material has been removed in whole or in part, it will be replaced with a material that has no asbestos content and fulfils the equivalent function of the original asbestos material, e.g. for fire protection.

5.5 Non-licensed works

Works will be carried out by specifically trained contractors with appropriate equipment and working procedures in place to comply with the CAR 2012. Risk assessments and insurance will be scrutinised before works begin.

5.6 Notifiable non-licensed works

Works will be carried out by an asbestos removal contractor (LARC) licensed by the Health & Safety.

5.7 Licensed works

Executive in compliance with the CAR 2012.

NLM's Asbestos Register and associated risk matrix define response times based on material risk scores as set out below;

6 Risk-Based Response Times

This tiered approach ensures that higher-risk ACMs are prioritised for urgent remediation while maintaining compliance and safety for lower-risk materials.

Risk Level	Score Range	Response Timeframe
High Risk	≥10	Immediate action required
Medium Risk	7–9	Within 3 months
Low Risk	5–6	Within 6–12 months
Very Low Risk	≤4	Annual monitoring and management

NLM Repairs & Maintenance Policy outlines the following response categories:

P1 – Emergency Repairs: Response within 4–24 hours; completion within 48 hours to 5 days.

P2 – Urgent Repairs: Response within 24 hours; completion within 5 working days.

P3 – Routine Repairs: Response and completion within 28 days.

Asbestos-related follow-up works should be categorised based on the risk level and urgency of the ACM condition. For example, a deteriorating ACM in a communal area with a score of 10 and above would likely fall under P1 or P2.

7 Record Keeping

7.1 NLM maintains a programme of non-domestic surveys and re-inspections and an Asbestos Register.

- 7.2 The Asbestos Register will be used to record the details of all asbestos surveys undertaken on non- domestic (communal), commercial and domestic properties. This will include the date of the inspection, the findings from the survey, any remediation works identified and subsequently completed. The database and register should also record the date of any subsequent re- inspection required.
- 7.3 Orders for asbestos surveys and follow on works will be issued to contractors via the SDM Housing Management System.
- 7.4 Asbestos surveys, laboratory reports and certificates will be transferred electronically from the contractor to NLM's central document repository in a standardised format and on the Meridian Compliance System.

8 Performance Monitoring and Reporting

- 8.1 There is a robust procedure in place for monitoring compliance and validating asset lists.
- 8.2 Key performance indicator (KPI) measures are in place, regularly reviewed and reported to senior management, other relevant staff, resident committees, and the Board.
- **Asbestos Register:** Maintained centrally and updated with each survey, including inspection dates, findings, and remediation actions
 - **Meridian Compliance System:** Used for storing survey reports, lab results,
 - **Non-Access Protocols:** Documented procedures are in place to manage and follow up on properties where access is denied

9 Contractor Engagement

- 9.1 **UKAS-Accredited Contractors:** All asbestos surveys and re-inspections are carried out by competent, accredited contractors
- 9.2 **Work Orders:** Issued via the SDM Housing Management System, ensuring traceability and compliance

10 Identifying Asbestos Containing Materials, Assessing and Managing Risk.

- 10.1 Identification of the presence of asbestos in all the councils' commercial buildings and housing stock shall be established through Asbestos Surveys. These shall be undertaken by a competent person in accordance with the requirements of HSG 264: Asbestos: The survey Guide.

- 10.2 The purpose of the survey is to allow NLM to manage asbestos in its properties. It will provide accurate information on the location, amount, and condition of the ACM. It will allow the preparation of an asbestos register for each property, and asbestos plan.
- 10.3 There are three types of survey:
- 10.3.1 **Management Surveys:** This is the standard survey. It is used to locate, as far as is reasonably practicable, the presence and extent of any suspect ACM within the building that could be damaged during normal occupancy actions. The survey will involve minor intrusive works and testing of materials.
- 10.3.2 **Refurbishment Survey:** This survey must be undertaken before any refurbishment work is undertaken. This is a fully intrusive survey used to locate all ACMs within the refurbishment area.
- 10.3.3 **Demolition Survey:** This survey must be undertaken before any demolition work is undertaken. This is a fully intrusive survey used to locate all ACMs within the demolition area.
- 10.4 The asbestos surveys will include a 'material' and 'Priority' assessment for all ACM. This will provide a risk rating in accordance with HSE guidance. This risk rating will allow NLM to determine an appropriate management action plan for the ACM.
- 10.5 The condition of asbestos in building where identified shall be inspected and monitored at least annually by NLM. This is to monitor the ongoing condition of the ACM so that timely action can be taken if the material starts to deteriorate and become a risk. These shall be recorded, preferably with the Asbestos Register details.

11 NLM Resident Engagement Strategy – Asbestos Management

11.1 Objective

To inform and support residents following the identification of low-risk asbestos in their homes, ensuring safety, transparency, and compliance.

11.2 Key Actions

- 11.2.1 **Clear Communications.** Send tailored letters explaining the findings, risk level, and next steps. Include a floor plan and asbestos management plan for each home. (Appendix 2 – Letter to residents)
- 11.2.2 **Accessible Support** Provide a dedicated phone line and email for resident queries. Offer translated materials and large print versions where needed.
- 11.2.3 **Resident Involvement** Host drop-in sessions and estate walkabouts to answer questions and build trust. Use resident scrutiny panels to review engagement effectiveness.

11.2.4 **Monitoring Reporting** Track resident feedback and report engagement outcomes to the board and regulator.

12 Roles and Responsibilities

NLM Board	Overall governance responsibility for ensuring that the organisation is compliant with regulatory standards, legislation and codes of practice.
Chief Executive	Strategic responsibility for the management of asbestos containing materials and for ensuring that compliance is achieved and maintained.
Assets Director	Responsible for the implementation of the asbestos management policy.
Maintenance Manager	Assist the Assets Director with asbestos management policy implementation.
Compliance Officer	Responsible for overseeing the delivery of the agreed survey inspection programmes and the prioritisation and implementation of any works arising from the surveys.
Competent contractor	Responsible for the operational delivery of asbestos management survey and re-inspection programmes, the update of the Asbestos Register, and removal and encapsulation works. Contractors must be UKAS accredited and HSE licensed for removals.

13 Policy Review

This policy is reviewed annually, or sooner if it no longer reflects best practice.

14 Appendix 1: Impact Assessment

<p>How does the policy/procedure/strategy contribute to NLM's aims?</p>	<p>The policy is a statement of our intention to meet all statutory obligations associated with the control of asbestos.</p>
<p>Which group(s) of people benefit from the policy/procedure/strategy? If any group could be disadvantaged, what is the mitigation or justification?</p>	<p>All groups benefit from this policy in terms of health & Safety. It is also beneficial for residents, staff and the Board to be aware of NLM's statutory obligations.</p>
<p>How have residents been involved in developing the policy/procedure/strategy? If they have not been involved, why not?</p>	<p>The policy is a statement of our intention to meet all statutory obligations associated with the control of asbestos. There is no scope for resident involvement other than Board approval.</p>
<p>How will the policy/procedure/strategy be monitored and measured? (e.g. performance indicators?)</p>	<p>None</p> <p>A requirement to monitor has been included in this policy document. Means of monitoring have been built into the Association's asbestos procedures.</p> <p>Health and safety compliance is subject to internal and external audit.</p>
<p>If any, what are the Value for Money implications?</p>	<p>The policy is a statement of our intention to meet all statutory obligations.</p> <p>Value for Money is not a consideration for this policy.</p>
<p>Will personal data be collected, stored, used or shared? If yes, a privacy impact assessment must be carried out.</p>	<p>Yes, personal information may be shared with contractors (e.g. name, address, contact details) in order to allow them to carry out required works in compliance with GDPR 2018</p>

15 Appendix 2: Asbestos Letter to Residents



NLM

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17 June 2025

Dear [REDACTED]

Re: Asbestos / [REDACTED]

Further to our letter dated 5 June 2025, we informed you that we would provide an information sheet in the form of a floor plan detailing the location of asbestos within your home. Please find enclosed the floor plan, which indicates the areas where asbestos is present.

As mentioned in our previous letter, asbestos that is in good condition and remains undisturbed does not generally pose a health risk. We advise you to avoid disturbing or damaging these areas.

In the event that we carry out any major work in the affected areas, this will typically involve the compliant removal, containment, and disposal of asbestos-containing materials (ACMs) in accordance with safety regulations.

Please see enclosed in this envelope a chart which shows the following:-

- Name of the contractor carried out the asbestos survey
- Where the asbestos is located
- The type of asbestos presumed to be identified
- Condition & treatment
- Assessment score

If you have any questions or concerns, please do not hesitate to contact us.

Your sincerely,

Mohi Uddin

Compliance Team