Asbestos Management Policy

Audience:	Customers, Colleagues, Contractors, Stakeholders, Board Members
Policy Owner:	Executive Director of Existing Homes
Policy Lead:	Head of Building Safety
Approved by:	Executive Team
Approved date:	June 2026
Next review date:	June 2029

1. Context, purpose and scope of the policy

Context

We own and manage homes and buildings constructed across a range of periods, including properties built before 2000 when asbestos-containing materials (ACMs) were commonly used.

Under the Control of Asbestos Regulations 2012, including Regulation 4 (Duty to Manage), we have a legal duty to identify the location and condition of asbestos-containing materials, assess the risk of exposure, prepare and implement an effective Asbestos Management Plan and review those arrangements periodically.

Asbestos does not present a risk when it is in good condition and left undisturbed. However, if damaged or disturbed, asbestos fibres may be released and inhaled, posing a serious risk to health.

Effective asbestos management is therefore a critical component of our wider building safety responsibilities and essential in protecting customers, colleagues, contractors and members of the public.

Strong governance, accurate records, competent surveys and clear accountability are essential to demonstrating compliance and reducing risk so far as is reasonably practicable.

This policy forms part of Moat’s statutory building safety compliance framework covering Fire, Legionella, Asbestos, Gas, Electrical, Lifts (FLAGEL).

Purpose

This policy sets out how we manage asbestos risks across the buildings and homes we own and manage.

It establishes our approach to:

- Preventing exposure to asbestos, so far as reasonably practicable
- Identifying, assessing and recording asbestos-containing materials
- Maintaining an accurate and accessible Asbestos Register
- Managing surveys, re-inspections and remediation works
- Ensuring competent contractors and independent assurance
- Providing effective governance, reporting and oversight.

It ensures asbestos risks are controlled proportionately and that we can evidence compliance to regulators and other stakeholders.

Scope

This policy applies to:

- Communal areas of residential buildings
- Non-domestic premises we own or manage
- Offices and commercial buildings under our control
- Retirement and supported housing schemes
- General needs homes where we hold repairing responsibility.

This policy does not apply to:

- Private dwellings where we do not hold repairing responsibility (except where they form part of common areas)
- Buildings we do not own or manage (in these cases we seek written assurance from managing agents where appropriate).

Operational detail is contained in the Asbestos Management Procedure.

2. Definitions

- **Asbestos:** A group of naturally occurring fibrous minerals, including crocidolite (blue), amosite (brown) and chrysotile (white), which may release fibres when disturbed.
- **Asbestos Containing Materials (ACMs):** Materials containing asbestos fibres.
- **Duty holder:** The organisation with legal responsibility under the Control of Asbestos Regulations 2012 for managing asbestos in non-domestic premises.
- **Non-domestic premises:** Premises to which Regulation 4 of the Control of Asbestos Regulations 2012 applies, including offices, commercial units and the common parts of residential buildings.
- **Common parts:** Areas of residential buildings used by more than one household, including corridors, stairwells, plant rooms and communal facilities.
- **Asbestos Management Survey:** A survey undertaken to locate ACMs that could be disturbed during normal occupation and maintenance.
- **Refurbishment and Demolition Survey:** A fully intrusive survey required before refurbishment or demolition works.
- **Licensed works:** Higher-risk asbestos works requiring an HSE (Health and Safety Executive)-licensed contractor.
- **Non-licensed works:** Lower risk asbestos works permitted without a licence but carried out by trained and competent contractors.

3. How this policy supports our strategy

This policy supports the delivery of Moat's Corporate Strategy and related supporting strategies by ensuring that building safety risks are identified, controlled and monitored through robust compliance and assurance arrangements.

- Corporate Strategy
- Existing Homes Strategy
- Customer Strategy
- Building Safety Customer Engagement Strategy
- Value for Money Framework
- People and Culture Strategy

Robust asbestos management ensures risks are identified and controlled across our housing stock.

4. Policy principles

We:

- Put the health and safety of customers, colleagues and contractors first in all decisions relating to asbestos management.
- Take a preventative and proportionate approach to managing asbestos risks.
- Maintain transparency about the presence and condition of asbestos, where relevant.
- Ensure strong governance, oversight and independent assurance arrangements are in place.
- Manage asbestos risks so far as is reasonably practicable, balancing safety, practicality and value for money.

5. Aims and objectives

Aim: To ensure asbestos risks in buildings and homes under our responsibility are identified, recorded and managed effectively, reducing the risk of exposure and demonstrating compliance with statutory obligations.

Objectives

1. Maintain full compliance with statutory and regulatory asbestos requirements.
2. Maintain an accurate and up-to-date Asbestos Register.
3. Ensure appropriate surveys, re-inspections and risk assessments are completed.
4. Ensure safe management and remediation of identified asbestos-containing materials.
5. Provide effective monitoring, reporting and independent assurance.

6. Policy actions

Objective 1: Maintain full compliance with statutory and regulatory asbestos requirements

- We will comply with the Control of Asbestos Regulations 2012 and associated Approved Codes of Practice and guidance.
- We will recognise and discharge our duties under Regulation 4 to identify, assess and manage asbestos risks in relevant premises.
- We will ensure sufficient financial and operational resources are allocated to meet asbestos management obligations.
- We will ensure colleagues with designated asbestos responsibilities receive appropriate training and maintain competence.

Objective 2: Maintain an accurate and up-to-date Asbestos Register

- We will maintain and regularly update a central Asbestos Register within our asset management system.
- We will ensure asbestos information is accessible to colleagues and contractors who require it to discharge their responsibilities safely.
- We will retain asbestos survey, inspection and remediation records in line with statutory and organisational record retention requirements.
- We will reconcile asbestos data periodically to ensure relevant buildings and components are captured accurately.

Objective 3: Ensure appropriate surveys, re-inspections and risk assessments are completed

- We will commission UKAS-accredited organisations to undertake asbestos surveys.
- We will ensure asbestos management surveys are completed in all relevant non-domestic areas within 12-month cycles according to risk rating.
- We will ensure re-inspections of identified ACMs are completed at appropriate intervals based on risk.
- We will ensure Refurbishment and Demolition Surveys are undertaken prior to intrusive or structural works.
- We will ensure relevant asbestos information is reviewed and considered before works commence to prevent accidental disturbance.

Objective 4: Ensure safe management and remediation of identified asbestos-containing materials (ACMs)

- We will ensure identified ACMs are risk assessed and managed in accordance with an Asbestos Management Plan.
- We will ensure licensed works are undertaken only by HSE (Health and Safety Executive) licensed contractors.
- We will ensure contractors are provided with relevant asbestos information prior to works commencing.
- We will ensure clear arrangements are in place for managing suspected asbestos disturbance incidents, including isolation, specialist assessment and regulatory reporting where required.
- We will take appropriate measures to protect customers when works involving ACMs are undertaken in occupied homes and buildings.

Objective 5: Provide effective monitoring, reporting and independent assurance

- We will operate internal monitoring and assurance arrangements to oversee asbestos compliance.
- We will undertake internal and independent external audits as part of our assurance programme.

- We will report asbestos compliance performance to the relevant governance panels, Executive Team, Audit and Risk Committee and Board.
- We will respond promptly to audit findings, regulatory engagement or incidents and track actions to completion.

7. Monitoring, reporting and review

The Executive Director of Property & Assets holds overall accountability for compliance with this policy.

The Head of Building Safety is responsible for ensuring appropriate monitoring arrangements are in place to oversee compliance.

Compliance is monitored through inspection programmes, action tracking, internal assurance reporting, contractor performance monitoring and periodic internal and external audit.

Building safety compliance performance is reported through the Keeping Our Customers Safe governance panel, with escalation through the Executive Team, Audit and Risk Committee and Board where required.

This policy will be reviewed every three years, or earlier if legislation, regulatory expectations or service delivery changes.

8. Equality, diversity and inclusion

This policy will be delivered in line with our Equality, Diversity and Inclusion Policy.
An Equality Impact Assessment was completed for this policy and considered as part of the approval process.

9. Data protection

We use a risk-based approach to processing personal data to ensure that we assess any risks to privacy or to the rights and freedoms of people before commencing, commissioning or changing data processing activities. Our Data Protection Impact Assessment (DPIA) process was completed as part of the approval process.

10. Related legislation and regulations

- Control of Asbestos Regulations 2012
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- ACOP L143 – Managing and Working with Asbestos
- HSG 264 – Asbestos: The Survey Guide
- HSG 227 – Managing Asbestos in Premises

11. Related policies and procedures

- Asbestos Management Procedure
- Fire Safety Management Policy
- Gas and Heating Management Policy
- Electrical Safety Policy
- Lift Policy
- Legionella Management Policy
- Health & Safety Management Policy
- Contractor Management and CDM Policy
- Temporary Moves Policy
- Risk Assessment Procedure
- No-Access Procedure
- Complaints Policy
- HS-PM-22 Asbestos – Day-to-Day Process
- HS-PM-23 Asbestos – Emergency Process
- HS-PM-24 Asbestos – Projects, Planned Major Replacements Process
- HS-PM-25 Asbestos – Dumped Asbestos Process
- HS-PM-26 Asbestos – Out of Hours Process
- HS-PM-27 Asbestos – Empty Homes Process
- HS-PM-29 Asbestos – Communal Re-inspections
- HS-PM-30 Asbestos – Properties Added to Portfolio – Property Transfers
- HS-PM-31 Asbestos – Requests for Asbestos Information
- HS-PM-32 Asbestos – Asbestos Remediation Requiring A License
- HS-PM-35 Asbestos – Protocol For Directing Asbestos Taken Through Customer Services
- HS-PM-36 Asbestos – Thermoplastic Floor Tiles
- HS-PM-37 Asbestos – Major Works Project

12. Customer engagement

We engaged with customers through our Repairs Forum to seek feedback on these policies. Overall, customers felt the policies were clear and comprehensive but highlighted that they can be detailed and would benefit from a more accessible summary. Feedback also emphasised the importance of clear communication about what these policies mean in practice, particularly where works may affect customers in their homes.

In response, we have made minor clarity improvements where appropriate and will develop a short, customer-friendly summary to support understanding. Feedback has been shared with relevant teams and has informed how we communicate building safety more broadly. The feedback loop has been closed with customers.

Document revision history

Date	Changes approved by	Details of changes made
Add your text here	Add your text here	Add your text here