

# Bromford.

## Asbestos Management Policy

September 2024

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### Policy Statement & Purpose

Bromford Housing Group (BHG) are fully committed to meeting all relevant statutory & regulatory requirements, including best practice standards, in asbestos management and also ensuring continual improvement in compliance performance, adopting a zero-tolerance approach to any deviation from this policy.

The purpose of this policy is to demonstrate BHGs commitment to ensuring that the risk to people, buildings and the wider business are reduced as far as reasonably practicable, whilst ensuring that all legislative requirements are met. This policy will be supported by detailed operating procedures, in the form of an [Asbestos Management Plan](#), to ensure we assess, control and manage asbestos in our buildings and the policy is fully embedded into routine working practice across the business.

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### 1. Scope

1.1 The Asbestos Policy and associated procedures detail how BHG meets the requirements of the Control of Asbestos Regulations 2012 and all associated legislation and regulations. In addition to this, the policy provides assurance to BHG that measures are in place to identify, manage and/or mitigate risks associated with asbestos. As part of the policy BHG will ensure compliance with asbestos legislation and formally report at Executive and Board level, the details of any non-compliance and planned corrective actions.

1.2 The policy is relevant to all BHG employees, customers, contractors and other persons or stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services. It should be used by all to ensure they understand the obligations placed upon BHG to maintain a safe environment for customers and employees within our buildings.

1.3 BHG will follow a systematic approach to the management of asbestos to ensure it meets the requirements set out in the Asbestos Regulations and other relevant legislation relating to

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asbestos. This is to ensure the safety of customers, leaseholders, employees and members of the public.

1.4 This policy applies to all BHG offices and buildings under its control or occupation. It also applies to any of our housing blocks and support schemes where the building is under our management. Where the building is controlled or managed by a third party then the responsibility for asbestos management in their designated areas must be agreed, and subsequently monitored, with the management company or commercial tenant unless this is otherwise stated in the management contract.

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## 2. Reference Documents

### List of Referenced Documents

#### Asbestos Management Plan

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## 3. Policy Principles

3.1 BHG are committed to providing a robust, safe and cost-effective service to our customers in relation to the management of asbestos. In respect of our responsibilities for asbestos management BHG will:

- Appoint a person (or persons) responsible for complying with all our Health & Safety/asbestos management requirements and name a Duty Holder for managing the commitments within this Policy.
  - Retain an adverse risk appetite in matters relating to asbestos management.
  - Ensure a robust Asbestos Management Plan is in place and adhered to by all colleagues. This will be achieved by providing full training on the Plan for all necessary colleagues.
  - Ensure reasonable steps have been taken to locate and identify the presence of asbestos containing materials (ACM's) in all non-domestic properties and in domestic properties where maintenance or construction activities are likely to disturb ACM's.
  - Maintaining a register of asbestos locations in domestic and non-domestic properties.
  - Ensure the provision of arrangements for ensuring all asbestos related information is made available to all relevant organisations and persons who may potentially disturb ACM's during their activities working on Bromford's assets.
  - Carry out all required planned and preventative maintenance (PPM) schedules and inspections to ensure asbestos products remain safe in situ.
  - Ensure asset data bases and customer records are maintained accurately and data reconciliations continue to be carried out frequently, as defined in the supporting procedures.
  - Ensure emergency procedures are in place, reviewed regularly and available to all colleagues and relevant third parties.
  - Ensure relevant monitoring regimes are in place and to submit compliance reports regularly to Board, the Risk & Compliance Forum and the Executive team.
  - Report critical exceptions to an Executive Director in agreed timescales.
  - Ensure every contractor, in house delivery teams or consultant employed by Bromford to carry out works in our homes and buildings has the relevant licenses, registrations, accreditations and qualifications, as specified by the relevant regulations and Bromford procedures.
  - Ensure colleagues receive appropriate training to fulfil their duties in relation to asbestos management.
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- Have a robust process in place to gain access to homes and property for the undertaking of essential asbestos management inspection and works, in accordance with BHG's access procedures.
  - Fulfil our commitment to equality and diversity while delivering asbestos management services to our customers.
  - Engage with customers and leaseholders in a participative and empowering manner so that they can contribute to service provision in relation to asbestos management.
  - Ensure effective communication of the Asbestos Management Policy and the Asbestos Management Plan.
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#### **4. Responsibilities**

4.1 The Board is responsible for:

- Ensuring Bromford complies with legislation
- Ensuring effective controls are in place to manage asbestos effectively
- Reviewing compliance reports and scrutinising areas of non-compliance.

4.2 The Executive Team is responsible for:

- Reviewing, endorsing and achieving this policy's aims
- Ensuring the appropriate resources and performance management frameworks are in place to ensure compliance with applicable laws and regulations
- Inspiring a culture which ensures compliance is prioritised and colleagues are trusted and encouraged to report concerns of non-compliance.

4.3 The Audit and Risk Committee (ARC) are responsible for:

- Reviewing Compliance reports and control frameworks and make recommendations to Board.
- Providing assurance to Board on compliance with the law.

4.4 Risk and Compliance Forum (RCF) is responsible for:

- Approving this document and notifying Board of key changes to this document
- Reviewing and challenging asbestos safety performance

4.5 All colleagues are responsible for:

- Carrying out their work in line with this policy and associated procedures and processes
- Applying Bromford's DNA in everything they do
- Reporting non-compliance to line management as soon as practically possible
- Considering asbestos management in all our activities and notifying compliance leads of any activity which puts compliance at risk.

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#### **5. Legislative or Regulatory Requirements**

Our policy is to comply with all applicable legislation and regulatory requirements, including the following:

##### **5.1 Regulatory Standards**

The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was updated by the Homes & Communities Agency (HCA) in April 2015.

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## 5.2 Legislation

The principal legislation applicable to this policy is the Control of Asbestos Regulations 2012.

## 5.3 Additional Legislation

The policy operates in the context of the following legislation:

- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- The Construction (Design & Management) Regulations 2015
- The Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)
- Housing Act 2004
- Housing Health and Safety Rating System (HHSRS)
- The Landlord & Tenant Act 1985

## 5.4 Code of Practice

The principal code of practice applicable to this policy is:

- Managing and working with asbestos L143 - Control of Asbestos Regulations 2012.
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## **6. Assurance Framework**

6.1 The Legal and Regulatory risk appetite of Bromford's Board is generally minimal, and it is risk averse with respect to landlord asset compliance. As such we always do everything reasonably practicable to ensure Legal and Regulatory compliance. Our compliance management comprises high-level oversight and assurance at Board and Executive level, mid-level oversight at Senior Leadership level and detailed scrutiny at management level.

6.2 This policy assists with mitigating the risk identified in our risk register, namely 'We fail to ensure safety and asset compliance across our homes resulting in death or injury to customers, colleagues or a third party'.

6.3 A system of audits in line with our 3 lines of assurance will ensure that all aspects of this policy and any controls implemented, will be monitored to ensure its effectiveness.

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## **7. Performance Monitoring**

7.1 The following KPI's are measured across the Group and reported to the Landlord Compliance Forum:

- Number of relevant non domestic properties without a valid Duty to Manage (DTM) inspection

In addition, the following KPIs are measured across the group and reviewed by the Responsible Person and Senior Leaders:

- Number and % of relevant properties without a management survey
  - Number of overdue P1 asbestos actions
  - Number of asbestos incidents in month
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## 8. Training

8.1 Suitable asbestos related training will be provided to all colleagues who are likely to be exposed to asbestos containing materials or who require technical knowledge of asbestos and where it could be found in properties, details of what training will be provided will be held in the Asbestos Management Plan.

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## 9. Communication and Review

9.1 This policy is published on the Hub intranet site.

9.2 This policy will be reviewed annually and in line with changes to government guidelines.

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### Document Details

**Owner:** Head of Compliance (Customer Experience)  
**Author:** Head of Compliance (Customer Experience)  
**Approved By:** Risk and Compliance Forum  
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### Version Control

Renewal Date	Version	Approved By	Comments
23/11/2024	V1	RCF	New policy template applied – 23/11/2023
18/09/2025	V2	RCF	Policy reviewed & minor amendments approved by RCF 18/09/2024