



Asbestos Management Plan

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| Page | Version | Date | Author |
|--------------|---------|---------------|-----------------------------|
| Page 1 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Document Control

Revision History

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| Version Number | Version Date | Author/Group commenting | Summary of Changes |
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| 0.1 | June 2021 | Pennington Choices | Full new draft of Asbestos Management Plan |
| 1.0 | August 2021 | SLHD Board | Approval of management plan |
| 1.1 | September 2023 | Asbestos Compliance Officer | Planned review of management plan. Adapted for SLHD template and reviewed against Asbestos policy for consistency and duplication. Main changes include – <ul style="list-style-type: none"> • Removal of AIB- learning from incident • Clarity on internal processes for accessing information and ordering surveys. • Clarification on control measures |
| 2.0 | October 2023 | EMT | Approved at EMT 31.10.23 |
| 2.1 | November 2024 | Asbestos Compliance Officer | Full review of Asbestos Management Plan in line with 14.2 to review annually. No amendments required for this review. |
| 2.2 | November 2025 | Asbestos Compliance Officer | Full review of Asbestos Management Plan in line with 14.2 to review annually. Only amendments identified to the plan was for processes to be made clearer and split into individual process maps as previous process map was identified as all-encompassing and difficult to follow. |
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| | | | |
|--------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 2 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

CONTENTS

| | | |
|-----|---|----|
| 1. | Introduction | 4 |
| 2. | Scope | 7 |
| 3. | Principles of Asbestos Management | 8 |
| 4. | Key Roles and Responsibilities | 9 |
| 5. | Competent Persons | 10 |
| 6. | Instructions of Survey Works | 11 |
| 7. | Asbestos Programmes – Main Process | 20 |
| 8. | Remedial Works | 22 |
| 9. | Auditing of Asbestos Surveys and Remedial Works | 23 |
| 10. | Emergency Procedure | 24 |
| 11. | Training | 26 |
| 12. | Monitoring Performance | 27 |
| 13. | Non-Compliance / Escalation Process | 27 |
| 14. | How to Monitor & Review the Management Plan | 28 |
| 15. | Appendices | 30 |

| Page | Version | Date | Author |
|--------------|---------|---------------|-----------------------------|
| Page 3 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

1 Introduction

- 1.1 Breathing in air containing asbestos fibres can lead to asbestos-related diseases, such as lung cancer and asbestosis. There is usually a long delay between first exposure to asbestos and the onset of the disease (approximately 15-60 years). Asbestos-related diseases currently kill around 5,000 people a year in Great Britain. Only by preventing or minimising these exposures now can asbestos-related diseases eventually be reduced.
- 1.2 Any St. Leger Homes of Doncaster (SLHD) property built or refurbished before the year 2000 may contain asbestos. As long as the asbestos containing material (ACM) is in good condition and is not going to be disturbed or damaged, there is negligible risk. However, if it is disturbed or damaged it can become a danger to health, as people may breathe in asbestos fibres that have been released into the air.
- 1.3 Workers who carry out repairs and maintenance work are at particular risk. If asbestos is present and can be readily disturbed, is in poor condition and not managed properly, others who may be occupying our homes or buildings could also be put at risk.
- 1.4 We are responsible for the maintenance and repairs to domestic properties, communal blocks and other properties (offices, commercial shops, depots, and so on), many of which will have been constructed using ACMs.
- 1.5 The Control of Asbestos Regulations (CAR) 2012 place a legal duty on employers to prevent exposure of its employees to asbestos, or if this is not possible, to reduce it to its lowest level. We have duties under these regulations as they are legally responsible for the repair and maintenance of properties.

Under Regulation 4 of the CAR 2012, SLHD as the Duty Holder is required to:

- find out if asbestos is present in properties; determine the amount, where it is and its condition.
- presume materials contain asbestos unless there is strong evidence to prove they do not.
- create and maintain an up-to-date record of the location and condition of all ACMs.
- assess the risk from these materials.
- prepare and implement detailed plans to manage the risks from the asbestos.
- review and monitor the plan and the arrangements to implement it.

| Page | Version | Date | Author |
|--------------|---------|---------------|-----------------------------|
| Page 4 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

- provide information on the location and condition of ACMs to anyone liable to work on or disturb it; and
- regularly inspect any ACMs in our premises and update our records

As a housing association, with a wide property portfolio of differing ages there are a significant number of properties that contain asbestos in a wide range of locations. Therefore, to ensure the safety of tenants, residents, employees, contractors and members of the public, it is important that we manage the asbestos effectively. The Asbestos Management Plan sets out the different methods that will enable asbestos to be safely monitored, managed or removed dependent on the condition of the material, the location within the property and the likelihood of disturbance.

Regulations surrounding asbestos detail the responsibilities placed on organisations and individuals to safely work with and manage asbestos. The table below details the key regulations relating to asbestos and an overview of what they aim to achieve.

| Regulation | Overview |
|---|--|
| Regulation 4 - 'Duty to Manage' asbestos in non-domestic premises and the common parts of domestic premises (communal areas). | It requires duty-holders to identify the location and condition of asbestos and to manage the risk to prevent harm to anyone who works on the building or to building occupants. It also explains what is required of those who have a duty to co-operate with the main duty-holder to enable them to comply with the regulation. |
| Regulation 5 - Identification of the presence of asbestos | This regulation requires employers to identify the presence of asbestos and its type and condition before any building, maintenance, demolition or other work, liable to disturb asbestos, begins. It also sets out the requirement to arrange a survey if existing information on the presence of asbestos in the premises is incomplete or appears unreliable. |
| Regulation 8 – Licensing of work with asbestos | The regulation requires employers to obtain a licence from the Health and Safety Executive (HSE) before they can carry out licensable work with asbestos. (External contractors for undertaking these works have been checked when procured by SLHD) |
| Regulation 9 – Notification of work with asbestos | All Licensed and Notifiable Non-Licensed works must be notified to the relevant authority 14 days before the commencement of work. It |

| Page | Version | Date | Author |
|--------------|---------|---------------|-----------------------------|
| Page 5 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

| | |
|---|---|
| | also sets a requirement to notify them of any material change, different to the original notification. (External contractors for undertaking these works have been checked when procured by SLHD) |
| Regulation 10 Information, instruction and training | This regulation requires employers to make sure that anyone liable to disturb asbestos during their work, or who supervises such employees, receives the correct level of information, instruction and training to enable them to carry out their work safely and competently and without risk to themselves or others. |
| Regulation 11 – Prevention of exposure to asbestos | Dictates that employees are prevented from asbestos exposure. Requires organisations to take sufficient steps to reduce exposure to the lowest level and the least number of employees. |
| Regulation 16 – Prevent / reduce spread of asbestos | Every employer must prevent / reduce the spread of asbestos to the lowest possible level. Enclosures with negative pressure are one of the most effective ways to achieve this. |
| Regulation 18 – Designated areas | Requires employers to make sure areas where asbestos works are carried out are separated, clearly marked and restricted to those required to work in the area. It also requires suitable facilities to be available for employees to eat and drink. |
| Regulation 22 – Health records and medical surveillance | Medical records kept for 40 years since last date of entry. Adequate surveillance must be kept on employees. Medical examinations must be undertaken no more than two years from the date of exposure and then at two yearly intervals from then. After exposure consideration should be given to assigning work away from asbestos. |
| Regulation 25- 32 – Prohibitions and Related Provisions | Applies to the prohibition of asbestos, its importation, supply, use, labelling, exceptions and exemptions. |

| | | | |
|--------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 6 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Regulations 9, 18 and 22 do not apply where the exposure to asbestos is sporadic and where the risk assessment evidences that exposure will not exceed the control limit.

Other key legislation that relates to asbestos is as follows.

- Health and Safety at Work etc Act (HSAWA) 1974.
- Management of Health and Safety at Work Regulations 1999.
- Construction (Design and Management) Regulations 2015.
- Workplace (Health Safety and Welfare) Regulations 1992.
- The Control of Substances Hazardous to Health Regulations 2002.

2 Scope

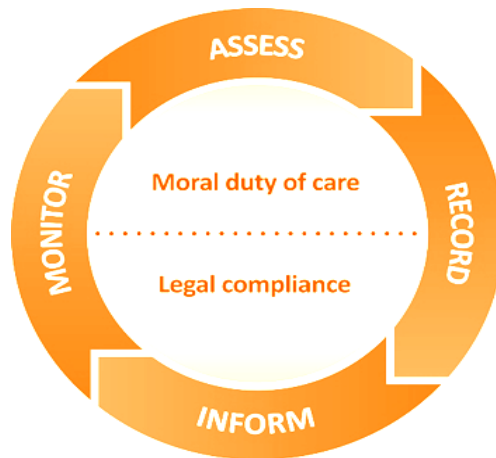
- 2.1 We have established a Board approved Asbestos Policy which is designed to ensure the organisation meets the requirements of the Control of Asbestos Regulations 2012 (CAR 2012), which came into force on 6 April 2012. We must also establish an Asbestos Management Plan (this Plan) which specifically meets the requirements of Regulation 4 within CAR 2012.
- 2.2 Regulation 4 covers the 'Duty to Manage' asbestos in non-domestic premises and the common parts of domestic premises (communal areas). It requires duty-holders to identify the location and condition of asbestos and to manage the risk to prevent harm to anyone who works on the building or to building occupants. It also explains what is required of those who have a duty to co-operate with the main duty-holder to enable them to comply with the regulation.
- 2.3 This Plan is relevant to all our employees, tenants, contractors and other persons or stakeholders who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services. It should be used by all to ensure they understand the obligations placed upon SLHD to maintain a safe environment for tenants and employees within domestic, non-domestic and other (offices, shops, depots, etc.) properties.
- 2.4 This Plan is designed to be a live document that is to be regularly reviewed, amended and updated as dynamic changes happen within the organisation and its operating processes. It should be read in conjunction with the Asbestos Policy and the Asbestos Management Process Map.

3 Principles of Asbestos Management

- 3.1 The key principals of Asbestos Management are: Assess, Record, Inform and Monitor.

| Page | Version | Date | Author |
|--------------|---------|---------------|-----------------------------|
| Page 7 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

3.2 The diagram below shows the ongoing nature of these four principles which enable continual compliance and demonstrate good practice and the moral duty of care the organisation holds.



3.3 ASSESS:

Asbestos in premises does not necessarily create an unacceptable risk. Asbestos is the hazard; the risk can only be defined when this hazard is assessed within the environment in which it is found.

This assessment must take into account the activities carried out near or on the asbestos and the level of human occupation in the immediate area around the asbestos for the assessment to be able to present viable recommendations. The best way to achieve this is to conduct a full asbestos survey, compliant with current guidance, which will identify and assess those hazards and risks and provide recommendations for the ongoing management of any ACMs found in those premises.

3.4 RECORD:

All assessments and the location and condition of any known or presumed ACMs must be recorded, updated and regularly reviewed within an Asbestos Register. Similarly, any changes to the condition or location of any known or suspected ACMs, any training, any controlled removal works, un-controlled disturbances, re-inspections, and so on, must all be recorded. It is imperative that all asbestos documents are kept up to date, are coherent, and are accessible to all members of SLHD, contracted workers, regular building users, maintenance operatives and tenants.

| | | | |
|--------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 8 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

3.5 **INFORM:**

Staff, contracted workers, regular building users, maintenance operatives, tenants, and so on, may require access to asbestos records. Therefore, all asbestos records held must be made available to anyone who may require them.

A system of training, seminars, question and answer sessions, and site inductions should be adopted where appropriate to ensure that everyone is kept informed about asbestos. The information they have access to should be relevant, accurate and understandable.

3.6 **MONITOR:**

All asbestos records, procedures, training and safe systems of work must be regularly monitored and reviewed; this is an Approved Code of Practice (ACoP) requirement. The purpose of this on-going monitoring is to ensure that the aims of the Asbestos Policy and Asbestos Management Plan are being met, that all systems are efficient and workable and that no one is being exposed to asbestos.

4 **Key Roles and Responsibilities**

- 4.1 SLHD's Board has overall governance responsibility for ensuring the Asbestos Policy, and this supporting Plan, is fully implemented to ensure full compliance with regulatory standards, legislation and approved codes of practice.
- 4.2 The Board and the Executive Management Team (EMT) will receive reports in respect of asbestos management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 4.3 The Director of Property Services has strategic responsibility for the management of asbestos and will oversee the implementation of this Plan. See Section 14 for details of the review schedule for this Plan.
- 4.4 The Head of Building Safety will be responsible for overseeing the delivery of the agreed survey inspection programmes and for the prioritisation and implementation of any remedial works arising from the surveys. The Head of Building Safety will receive operational support from the Health, Safety and Compliance Team, and other SLHD teams as required.
- 4.5 Housing teams will provide support in accessing those properties difficult to access by the asbestos team and facilitate the legal process.

| Page | Version | Date | Author |
|--------------|---------|---------------|-----------------------------|
| Page 9 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

5 Competent Persons

- 5.1 We will employ through procurement process competent external third-party surveyors to undertake asbestos surveys (management surveys, refurbishment surveys or combination and when required demolition surveys). The Health and Safety Executive (HSE) strongly recommends using UKAS accredited surveyors with UKAS accredited labs for fibre analysis. The Asbestos Team will check the accreditations and qualifications of these surveyors on an annual basis.
- 5.2 SLHD will ensure that competent asbestos removal contractors are procured and appointed to conduct asbestos remedial works. The Asbestos Team will check the relevant accreditations of these contractors and the qualifications of employees working for these contractors, for the small internal service provider team undertaking>NNLW any internal operatives undertaking this work will have qualifications checked on an annual basis and the appropriate method for documentation generation for those works.
- 5.3 Where there is a requirement for analytical services, either during or following asbestos removal or disturbance, we will engage these services through procurement process of a competent, suitably accredited, asbestos analytical company. This arrangement will avoid any conflict of interest that may occur if the analyst were to be employed directly by the removal contractor.
- 5.4 SLHD employees who request surveys and removals for remedial works should be suitably experienced and competent to do so (this will entail having asbestos awareness training to minimum Cat A, the requests will be processed by the SLHD Asbestos Team and checked by someone in the team who holds relevant qualifications, such as the BOHS P402, P405, P407, or W504, or recognised equivalents. The information received from SLHD employees for requests should be suitably concise enough to ensure that the appropriate type of survey is instructed for the survey/removal being undertaken, this will ensure the correct scope of works is provided for the surveys and removals to the asbestos contractor appointed.
- 5.5 All asbestos (refurbishment/management) survey and re-inspection survey requests, and all requests to carry out asbestos remedial works must be referred to the SLHD Asbestos Team so that they are able to ensure the Asbestos Register is populated with up to date and accurate asbestos information.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 10 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

6 Instruction of Survey Works

6.1 To ensure we have a clear and comprehensive view of the asbestos in our stock, surveys will only be carried out by accredited external contractors. Re-inspection and sampling exercises may be carried out in house or by a third party. In each case, the surveyor must be competent to carry out the work required. To be competent, the 'surveyor' must:

- As a minimum hold a British Occupational Hygiene Society qualification in modules P402 (building surveys and bulk sampling for asbestos).
- have sufficient training, qualifications, knowledge, experience and ability to carry out their duties in relation to the survey and to recognise their limitations.
- have sufficient knowledge of the specific tasks to be undertaken and the risks that the work will entail.
- be able to demonstrate independence, impartiality and integrity.
- have an adequate quality management system to ensure accuracy of reporting; and carry out the survey in line with recommended guidance, that is this publication.

The purpose of the survey is to help manage asbestos in the duty holder's premises. The survey must provide sufficient information for:

- an asbestos register and plan to be prepared.
- a suitable risk assessment (RA) to be carried out the surveys
- a written plan to manage the risks to be produced (Method Statement. MS).

We will use external accredited surveyors to undertake asbestos surveys on our behalf and in house trained employees to undertake sampling exercises and re-inspections along with specialist external organisations.

The two main different types of survey we use are as follows.

1 Management survey

A management survey is the standard survey. Its purpose is to locate, as far as reasonably practicable, the presence and extent of any suspect ACMs in the building that could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 11 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Management surveys will often involve minor intrusive work and some disturbance. The extent of intrusion will vary between premises and depend on what is reasonably practicable for individual properties, that is it will depend on factors such as the type of building, the nature of construction, accessibility and so on. A management survey should include an assessment of the condition of the various ACMs and their ability to release fibres into the air if they are disturbed in some way. This 'material assessment' will give a good initial guide to the priority for managing ACMs as it will identify the materials which will most readily release airborne fibres if they are disturbed.

The survey will usually involve sampling and analysis to confirm the presence or absence of ACMs. However, a management survey can also involve presuming the presence or absence of asbestos. A management survey can be completed using a combination of sampling ACMs and presuming ACMs or, indeed, just presuming. Any materials presumed to contain asbestos must also have their condition assessed by a material assessment.

2 Refurbishment and demolition surveys

This type of survey is needed before any refurbishment or demolition work is carried out (Regulation 5 of the CAR 2012). This type of survey is used to locate and describe, as far as reasonably practicable, all ACMs in the area where the refurbishment work will take place or in the whole building if demolition is planned. The survey will be fully intrusive and involve destructive inspection, as necessary, to gain access to all areas, including those that may be difficult to reach. A refurbishment or demolition survey may also be required in other circumstances, such as when more intrusive maintenance and repair work will be carried out.

There is a specific requirement in the CAR 2012 (Regulation 7) for all ACMs to be removed as far as reasonably practicable before major refurbishment or final demolition. Removing ACMs is also appropriate in other smaller refurbishment situations which involve structural or layout changes to buildings (such as removal of partitions, walls, units and so on).

Under the Construction (Design and Management) Regulations (CDM) 2015, the survey information should be used to help in the tendering process for removal of ACMs from the building before work starts. The survey report should be supplied by the client to designers and contractors who may be bidding for the work, so the asbestos risks can be addressed. In this type of survey, the survey does not normally assess the condition of the asbestos, other than to indicate areas of damage or where additional asbestos debris may be present. However, where the asbestos removal may not take place

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 12 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

for some time, the ACMs condition will need to be assessed, and the materials managed.

Refurbishment and demolition surveys are intended to locate all the asbestos in the building (or the relevant part), as far as reasonably practicable. It is a disruptive and fully intrusive survey that may need to penetrate all parts of the building structure. Aggressive inspection techniques will be needed to lift carpets and tiles, break through walls, ceilings, cladding and partitions, and open floors. In these situations, controls should be put in place to prevent the spread of debris, that may include asbestos. Refurbishment and demolition surveys should only be conducted in unoccupied areas to minimise risks to the public or employees on the premises.

For minor refurbishment (repairs that disturb the fabric of the building), this would only apply to the room involved, or even part of the room, where the work is small and the room large. In these situations, there should be effective isolation of the survey area (such as full floor to ceiling partition), and furnishings should be removed as far as possible or protected using sheeting. The 'surveyed' area must be shown to be fit for reoccupation before people move back in. This will require a thorough visual inspection and, if appropriate (for example where there has been significant destruction), reassurance air sampling with disturbance. Under no circumstances should employees remain in rooms or areas of buildings when intrusive sampling is performed.

There may be some circumstances where the building is still 'occupied' (that is in use) at the time a 'demolition' survey is carried out. For example, when the tenant is still living in the property while improvement works take place. To help ensure their safety, tenants should be asked to leave the property until all works around the survey have taken place. If asbestos needs to be removed from the property tenants should be asked to leave until works are completed and if necessary, reassurance air testing has taken place to ensure the area is fit for reoccupation.

Surveys are carried out before any improvement works take place on our stock. The survey results are downloaded onto C365 (the asbestos management software) to allow access for future repair and maintenance needs. Both the Open Housing (OH) and C365 systems will generate a warning to show a property has asbestos present based on the survey results and any amendments made to existing details.

We will carry out a management survey of all communal areas within our multi occupancy dwellings. We will undertake refurbishment or demolition surveys of all properties where major works or demolition of parts of the building is to take place. The refurbishment / demolition survey will allow us to determine where in the property any asbestos is present and help to build a picture of

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 13 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

where asbestos is found in properties from style, year of build and construction type.

6.2 Inspection Programme (non-domestic/communal blocks)

We will ensure that all non-domestic (communal blocks and other properties including offices, shops, depots, etc.) properties that we own or manage have an initial asbestos management survey carried out. All surveys will comply with CAR 2012 and will therefore be dated after 6 April 2012 when the regulations came into effect.

Thereafter, all non-domestic properties on the programme will have a re-inspection survey and an assigned re-inspection date where applicable. The re-inspection date will either be annual or at a period specified that will take into account the element, material risk assessment, condition and likelihood of disturbance, as an example, if the property only has identified DPC (damp proof course) with risk and is bitumen material the element of risk of fibre release is very low (7 or below) and can be moved to a 10-year re-inspection.

| Material and Priority Assessment Score Combination | Assigned Risk Level | Reinspection Frequency based on risk level for non-domestic properties |
|---|----------------------------|---|
| Score of 0 | | No further action required |
| Score of 1 to 7 (inclusive) | Very Low | Asbestos will be inspected on a 10 yearly basis |
| Score of 8 to 12 (inclusive) | Low | Asbestos will be inspected on a five yearly basis |
| Score of 13 to 17 (inclusive) | Moderate | Asbestos will be inspected on a one yearly basis |
| Score of 18 and over | High | Asbestos will be inspected on a six-monthly basis, repaired or removed |

We will not need to survey non-domestic properties built after the year 2000 or re-inspect properties where the initial asbestos management survey did not find ACMs, providing all relevant areas were accessed at the time of survey. If no asbestos is found to be present, but any areas were not accessed, these properties should remain on the re-inspection programme until the areas are access and asbestos is confirmed to be not present.

Within communal blocks, surveys will include inspection of communal areas such as, hallways, bin stores and communal garages.

Where areas of no access have been recorded, these will be re-visited to attempt to gain access where practicable.

| | | | |
|---------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 14 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Material assessment scores are made up of the following equation based on the following decisions when inspecting an asbestos containing material.

The re-inspections will be undertaken by a suitably competent person (SLHD asbestos Officer), or external survey contractor as required.

Material assessment scoring

Material assessment scores are made up of the following equation based on the following decisions when inspecting an asbestos containing material.

| Sample variable | Examples of scores | Score |
|--|---|-------|
| Product type (or debris from product) | Asbestos reinforced composites (plastics, resins, mastics, roofing felts, vinyl floor tiles, semi rigid paints or decorative finishes, asbestos cement etc) | 1 |
| | Asbestos insulating board, mill boards, other low density insulation boards, asbestos textiles, gaskets, ropes and woven textiles, asbestos paper and felt | 2 |
| | Thermal insulation (for example, pipe and boiler lagging), sprayed asbestos, loose asbestos, asbestos mattresses and packing | 2 |
| Extent of damage / deterioration | Good condition: no visible damage | 0 |
| | Low damage: a few scratches or surface marks; broken edges on boards, tiles and so on | 1 |
| | Medium damage: significant breakage of materials or several small areas where material has been damaged revealing loose asbestos fibres | 2 |
| | High damage or delamination of materials, sprays and thermal insulation. Visible asbestos debris | 3 |
| Surface type / treatment | Composite materials containing asbestos: reinforced plastics, resins, vinyl tiles | 0 |

| | | | |
|---------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 15 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

| Sample variable | Examples of scores | Score |
|----------------------|--|-------|
| | Enclosed sprays and lagging, asbestos insulating board (with exposed face painted or encapsulated), asbestos cement sheets and so on | 1 |
| | Unsealed asbestos insulating board, or encapsulated lagging and sprays | 2 |
| | Unsealed laggings and sprayed asbestos | 3 |
| Asbestos type | White (Chrysotile) only | 1 |
| | Brown (Amphibole asbestos excluding crocidolite) and mixtures (not blue) | 2 |
| | Blue (Crocidolite) and mixtures or type unknown | 3 |

Example: Chrysotile Floor Tile in good condition = (1) + (0) + (0) + (1) = 2

Priority Assessment Scoring

Priority assessment scoring is used to establish the frequency of use of an area, the type of use, where and how much of the asbestos is located

| Sample variable | Examples of scores | Score |
|-------------------------------|---|-------|
| Normal Occupant Activity | | |
| Main type of activity in area | Rare disturbance activity (for example, little used storeroom) | 0 |
| | Low disturbance activities (for example, office type activity) | 1 |
| | Periodic disturbance (for example, industrial or vehicular activity which may cause contact with ACMs) | 2 |
| | High levels of disturbance, (for example, fire door with asbestos insulating board sheet in constant use) | 3 |

| | | | |
|---------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 16 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

| Sample variable | Examples of scores | Score |
|----------------------------------|---|--------------|
| Likelihood of Disturbance | | |
| Location | Outdoors | 0 |
| | Large rooms, warehouse or well-ventilated areas | 1 |
| | Rooms up to 100 square metres in area | 2 |
| | Restricted or confined areas | 3 |
| Accessibility | Usually inaccessible or unlikely to be disturbed | 0 |
| | Occasionally likely to be disturbed | 1 |
| | Easily disturbed | 2 |
| | Routinely disturbed | 3 |
| Extent / Amount | Small amounts or single items (for example, strings, gaskets) | 0 |
| | Less than 10 square metres area, or 10 metre pipe run | 1 |
| | 10 to 50 square metres area, or 10 to 50 metres pipe run | 2 |
| | More than 50 square metres, or 50 metres pipe run | 3 |
| Human Exposure Potential | | |
| Number of occupants | None | 0 |
| | One to three | 1 |
| | Four to 10 | 2 |
| | More than 10 | 3 |
| Frequency of use of area | Infrequent | 0 |
| | Monthly | 1 |
| | Weekly | 2 |
| | Daily | 3 |
| | Less than one hour | 0 |

| | | | |
|---------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 17 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

| Sample variable | Examples of scores | Score |
|-----------------------------------|---|-------|
| Average time area is in use | One to less than three hours | 1 |
| | Three to less than six hours | 2 |
| | More than six hours | 3 |
| Maintenance Activity | | |
| Type of maintenance activity | Minor disturbance (for example, possibility of contact when gaining access) | 0 |
| | Low disturbance (for example, changing light bulbs in asbestos insulating board ceiling tiles) | 1 |
| | Medium disturbance (for example, lifting one or two asbestos insulating board ceiling tiles to access a valve) | 2 |
| | High levels of disturbance (for example, removing a number of asbestos insulating board ceiling tiles to replace a valve or for re-cabling, or leak repair) | 3 |
| Frequency of maintenance activity | Unlikely – almost never | 0 |
| | Less than once a year | 1 |
| | Less than once a month | 2 |
| | More often than once a month | 3 |

Example: Chrysotile floor tiles in good condition in bedroom 1+(2,1,2) +(1,3,3) +(1,1) =7

6.3 Repairs Service

We (Repairs Service Operatives, Team Leaders and/or Charge Hands) will review existing asbestos related information in C365 (Via Total Mobile) the asbestos compliance data base (asbestos register) prior to carrying out any responsive repair works which may involve working on or adjacent to any ACMs within property. This will ensure that any ACMs likely to pose a risk are identified prior to work starting and the details passed on to the relevant

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 18 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

operatives, team leader and/or charge hands or as required external contractors.

Where there is no asbestos information and for work to continue safely a targeted refurbishment and demolition (R&D) survey of the area of works should be commissioned prior to work starting, via the SLHD Asbestos Team. A management survey should be considered for the remainder of the property if required for on review by the SLHD Asbestos Team. We will not need to survey properties built after the year 2000 or re-inspect properties where the initial asbestos management/refurbishment surveys did not find ACMs located to the areas of the proposed works.

6.5 Void Properties

We (void operatives, team leaders and charge hands) will review existing asbestos related information in C365 the asbestos compliance data base (asbestos register) prior to carrying out any void works which may involve working on or adjacent to any ACMs within a void property. This is to ensure that any ACMs likely to pose a risk are identified prior to work starting and the details passed on to the relevant operatives or external contractors.

If there is no suitable asbestos related information available to carry out the work safely, voids will require a targeted refurbishment survey to facilitate the works with a management survey to the remainder of the property will be undertaken. For best practise it should be advised that a full refurbishment survey to void properties is undertaken that do not currently have a full refurbishment survey to future proof the asbestos information to that property.

Void properties (constructed prior to 2000) which are classed as major works, or those that are newly acquired, will have full R&D surveys undertaken. The scope for this survey will be defined to the asbestos surveyor to ensure all areas where works are likely to take place are covered by intrusive inspection within that survey. This must include details of; floor voids, pipe runs, electrical routes, loft spaces, wall voids and any changes to fitted kitchen and bathroom suites.

Note: If the void has been classed by the voids team as only requiring standard safety checks (gas, electric and EPC), and there is NO intrusive work, an asbestos refurbishment survey will not be required. (However, to future proof property information a management survey will be commissioned as part of the wider surveying strategy and plan to increase the volume and quality of asbestos related information).

- 6.6 **Planned** – The Client will review existing asbestos related information in C365 the asbestos compliance data base (asbestos register) prior to starting as part of the gathering pre-construction information to see if any suitable and sufficient asbestos surveys are held. If there are properties without suitable

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 19 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

and sufficient asbestos information or no survey information, the client will inform the asbestos team that a program of planned works is to be conducted. A planning meeting is to be undertaken with the project officer for the scheme that includes the Asbestos Team and Asbestos Surveying Consultant to agree scope(s) of surveys and a timetable for completion. Following the pre-start meeting where survey scopes have been agreed the schedule of addresses for a scheme should be sent to the Asbestos Team with a minimum of 6 weeks' notice from the proposed start date of the works. Where necessary (for example, planned scheme works), the Asbestos Team will require the property information (in agreed spread sheet template) from the Client as an agreed priority batch list of addresses and issue properties on an ongoing basis based on the priority to the Asbestos Surveying Consultant. This will manage expectations for all parties.

Surveys will be required to 100% of properties in planned works programme for houses and low-level flats, NO extrapolation of survey data to be used from one property to another on a road/street. Where works to multi story blocks are being undertaken, depending on the extent of disturbance (i.e., remove and refit sink/toilet) it would be reasonable and practicable for the extrapolation of survey data to be used from one flat to another within the same block under the guidance from the asbestos team.

7 Asbestos Programmes – Main Process

- 7.1 **Process Map** - The Asbestos Management Process Map will detail the key stages in the process along with who is assigned accountability at each key stage i.e., Health, Safety and Compliance Team, other internal teams, Asbestos Surveying Consultant and Licensed Asbestos Removal Contractor (LARC). Appendix A
- 7.2 **Asset Lists** - We will ensure that all domestic properties and non-domestic properties (communal blocks, offices, shops, depots, etc.) we own or manage are included on the appropriate asbestos programs. The address lists for the programs will be drawn from Open Housing and validated on an ongoing basis to consider property acquisitions, disposals and any changes in use. A full reconciliation of property assets will take place annually in June by the Asset team.
- 7.3 **Data and Records** - We will hold accurate asbestos records against each block and property we own or manage. We will use Compliance C365 as our Asbestos Register to record asbestos survey dates, survey reports, survey results and updates following remedial works. Electronic copies of the surveys will be saved in Compliance C365. The Asbestos Team will have overall responsibility for instructing asbestos surveys or remedial works and will ensure that Compliance C365 is updated with information and dates to show a clear audit trail of any action taken.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 20 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

7.4 Like for like renewals.

Prior to any works C365 should be interrogated to see if any ACMs are identified where works are to be undertaken.

If suitable information is not available works can commence on certain activities as detailed below. Or a survey can be requested.

For items such as external doors (UPVC, Composite), UPVC windows, extractor fans including covers, which have been replaced or renewed previously (after year 2000), and these items are not adjacent to textured coatings (door/window reveals).

It can be safely assumed that any ACMs have been removed or none suspected when the previous renewal (installation for fans) has taken place.

Should any suspicious item be discovered during the renewal (behind door/window frame) the emergency procedure instigated and SLHD asbestos team should be contacted immediately.

This process should be indicated in the work specific RAMS for that work stream.

This could be safely assumed that any ACMs had been removed previously during renewal after 2000, but the RAMS should indicate to proceed on that assumption, prior to the works being undertaken an assessment must be done by the team/designated person undertaking the renewal to identify visually any textured coatings adjacent/in contact with the items to be renewed

Likewise for kitchen units, if they appear modern in appearance then it should be safely assumed that any ACMs have been removed. However, the RAMS should indicate to proceed on that assumption, prior to the works an assessment must be done to identify visually any textured coatings adjacent/in contact with the units to be renewed, along with floor tiles which would they be damaged while units are being removed.

- 7.5 **Tenant Notification** - Once works have been identified by Client, notification letters are issued to tenants, using a standard letter, to advice of the forthcoming works and the need for asbestos surveys. This letter notification is undertaken by the Client contractor for the works and include contact information for the asbestos survey companies.

When a tenant signs up to a property, they are provided with an asbestos DIY leaflet (see Appendix B) which details key information for them to remember about asbestos. This includes the requirement for them to request permission to complete their own works on their property (to enable any surveys or additional precautionary measures to be put in place), information about where asbestos is commonly found in properties, reassurance about the safety of asbestos if left alone and contact details should they have queries about materials in their home. Our website also holds asbestos information (SLHD Asbestos in the home booklet) detailing where asbestos can be found as well as contact numbers in the event of an emergency. See appendix C.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 21 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

- 7.6 **Asbestos Surveys for Voids, Repairs** - at any point throughout the year the need for additional survey works may be identified. All new asbestos survey requests for voids, repairs must be raised through the Asbestos Team via the Asbestos Team using the request form (Appendix D) and emailed to AsbReq@stlegerhomes.co.uk
- 7.7 **Attend Site** - The Asbestos Surveying Consultant will attend site and undertake asbestos management survey, refurbishment survey, (combination of both), R&D survey or re-inspection survey, take context photographs (for example, of the external building, sample areas) and photographic evidence of remedial actions, such as the location and condition of ACMs as per the tender specification. The Asbestos Surveying Consultant will raise any immediate actions with the Health, Safety and Compliance Team. The Asbestos Surveying Consultant will issue the asbestos surveys via direct upload into C365 the asbestos register to the Asbestos Team within ten working days of the site visit, or 72 hours if it is a void property. The reports are quality checked in C365 by the Asbestos Team before making live in C365.
- 7.8 **Quality Assurance** - The Asbestos Team will review 100% of the surveys submitted by the Asbestos Surveying Consultant to provide quality assurance. Any issues identified will be referred to the Asbestos Surveying Consultant for correction. An update of these actions will be reported in the monthly contractor meetings or sooner as required.
- 7.9 **Tenants and Leaseholders** - We will use the legal remedies available within the terms of the tenancy/lease agreement should any tenant/leaseholder/shared owner refuse access to conduct essential asbestos related inspection and remediation works to those areas managed by SLHD.

8 Removal Works

- 8.1 The Asbestos Team will extract remedial actions from the surveys and record them in Compliance C365. If asbestos is identified in those areas where work is to be undertaken, a removal works orders will be raised to the Asbestos Team using the request form (Appendix E) and emailed to AsbReq@stlegerhomes.co.uk by the appropriate team for that workstream. The form will be issued by the Asbestos Team to the appointed Licensed Asbestos Removal Contractor (LARC) or the internal team removal team (for floor tiles). The LARC or the internal team will then complete the following:
- Attend site and undertake the remedial works as per the instruction received.
 - Provide the required removal information/documentation to the Asbestos Team including all relevant evidence (for example, before and after photographs, certificates and documents) in electronic format, these documents will be uploaded into Compliance C365 (asbestos register) by the LARC or the internal team when the works have been completed.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 22 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

- 8.2 All notifiable and non-notifiable remedial works are to be completed by the appointed Licenced Asbestos Removal Contractor (LARC).
- 8.3 When non-licensed works are carried out by the internal team, the Health & Safety Executive Asbestos Essentials guidance will be followed and adhered to along with site specific Risk Assessments and Method Statements (RAMS).
- 8.4 Once remedial actions have been completed and the required evidence/documentation received, the Asbestos Team will update Compliance C365 with the new asbestos information (including removal date, date of next inspection, and any changes to the condition ACMs), and ensure the documentation has been saved electronically.
- 8.5 Where partial remedial works or removals have been conducted, this must be made clear within Compliance C365. For example, if only perimeter floor tiles are removed to allow installation of carpet grips, the entry in Compliance C365 relating to the asbestos floor tiles must remain, with information added to say only perimeter tiles have been removed.
- 8.6 As required, the Asbestos Team will attend site to undertake a post-inspection of the completed works. If any issues are identified, these will be referred to the LARC or internal team for correction. Following this, the Asbestos Team will complete the post-inspection and record all relevant information, including photographic evidence, in Compliance C365.
- 8.7 When AIB has been identified in the asbestos survey for a property, where it is reasonable and practicable the AIB will be removed. As an example, if the AIB is to an area in a property where the likelihood is it could be accidentally disturbed (landing wall, stairs, door) this will be removed. Examples are Easiform construction properties.
Where AIB has been identified and there is no reasonable and practicable way to remove the AIB, it will be managed by made safe until such a time it can be removed. An example would be AIB panels surrounding a water tank in a loft, to remove the AIB would require additional access hatch being made to facilitate a removal or removal of roof tiles.
The responsibility for the decision to remove the AIB will be undertaken by the Asbestos Team following the recommendations made by the competent surveyor.

9 Auditing of Asbestos Surveys and Remedial Works

- 9.1 SLHD have an auditing process to ensure we are monitoring the performance of our selected asbestos consultants and removal contractors. The audits will be a combination of retrospective and work-in-progress audits. These audits will be undertaken by the asbestos officers using iAuditor which will provide concise audit reports. Example reports at appendix F.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 23 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

- 9.2 We will if required outsource auditing tasks to suitably qualified, independent consultants. However, the audit process will be owned and implemented by SLHD staff.
- 9.3 All audits of asbestos information will be saved in a secure location and made available to all persons as required. The data gathered will be reviewed by a suitably competent person to establish if there are any anomalies, evidence of errors or poor performance of the consultants or contractors. The audit process will document how to proceed if anomalies are found, or further action is required.

10 Emergency Procedure

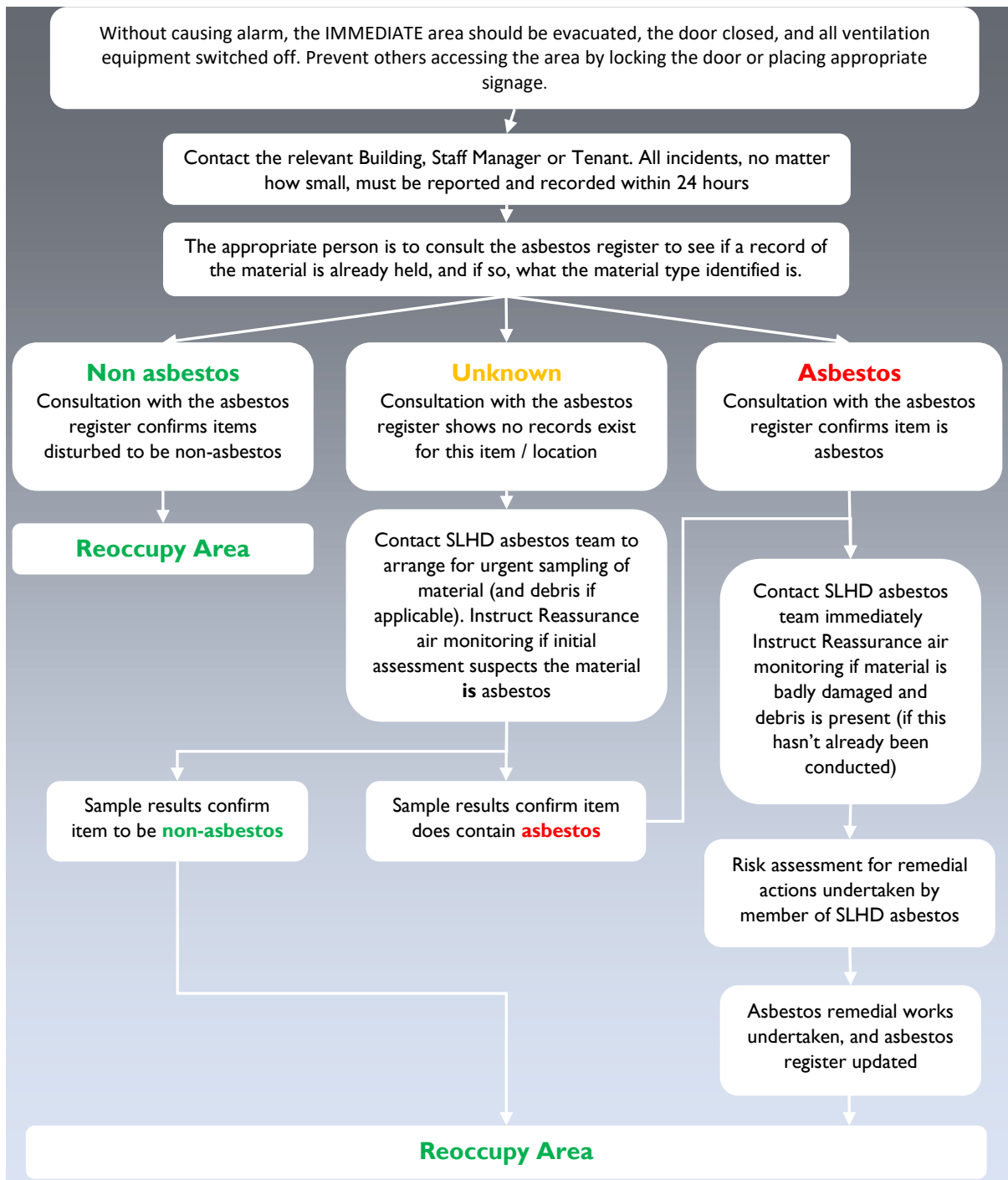
- 10.1 SLHD have a formal Emergency Procedure to be followed by all staff and contractors in the event of accidental disturbance of an ACM in any of our properties, communal blocks or other buildings. This procedure is outlined in the flow chart below (Figure 1).
- 10.2 The Emergency Procedure has been approved at Board level and implemented by the Director of Property Services.
- 10.3 The Emergency Procedure have been communicated to all staff and will be included in all instructions to any internal staff, contractors and/or surveyors working on our properties.

Emergency Contacts

| | | |
|--|--|--------------------|
| Name: Compliance Team | Tel: 01302 862346, 01302 862326 | Mobile: N/A |
| Out of Hours: Alarm Receiving Centre | Tel: 01302 341628 | Mobile: N/A |
| Out of Hours: Asbestos Removal Contractor | (EM1) Tel: 01609 881064 | Mobile: N/A |

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|---------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 24 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Figure 1 – Emergency Asbestos Procedure



11.1 Training will be delivered on this Plan and refresher training will be provided as appropriate.

11.2 All new starters to SLHD will have asbestos awareness training appropriate to their position, this will be identified in relevant training matrices.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 25 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

- 11.3 Training will be online based for those new employees who need to have a basic understanding and awareness of asbestos safety but who may not be actively involved in the delivery of the asbestos policy. This will be followed up with electronic asbestos awareness refresher training at 24-month intervals.
- 11.4 For those new employees who need to have an understanding and awareness of asbestos safety but who are actively involved in the delivery of the asbestos policy, this will be Cat A training for asbestos safety awareness that will include periodic team briefings/ toolbox talks backed up through a 12-month period with asbestos e-learning. Classroom Cat A training will then be at 24-month intervals.
- 11.5 Specific on the job training will be provided as required to those employees who will be responsible for managing or delivering the programme of planned maintenance and repair works as part of their daily job. This will include category B training for the few operatives who are asked to work on non-licensed works. A record of all such training will be kept and maintained by the Manager with responsibility for the operatives.

Training Table for employees who require both Cat A and Cat B.

| Cat A awareness training | Cat B awareness training |
|--|--|
| All new starters to SLHD will have classroom-based training. Then every 24-month intervals | All new starters to SLHD who will undertake non-notifiable non-licenced removals will have classroom-based training. Then every 12-month intervals |
| E learning training 12 months from last classroom-based training | Tool box talk session at 6-month intervals from classroom/E learning |
| Toolbox talk session at 6-month intervals from classroom/E learning | |

Details for Cat A and Cat B training can be found in the HSE training web site. <https://www.hse.gov.uk/asbestos/training.htm#certificates>

12 Monitoring Performance

- 12.1 Monitoring of performance will be through the safety and compliance performance framework.
- 12.2 Asbestos contractors will be monitored on performance on a monthly basis with KPI performance updated in the monthly contract meetings.

These KPIs are set withing the current contracts based on timescales and quality performance.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 26 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

13 Non-Compliance / Escalation Process

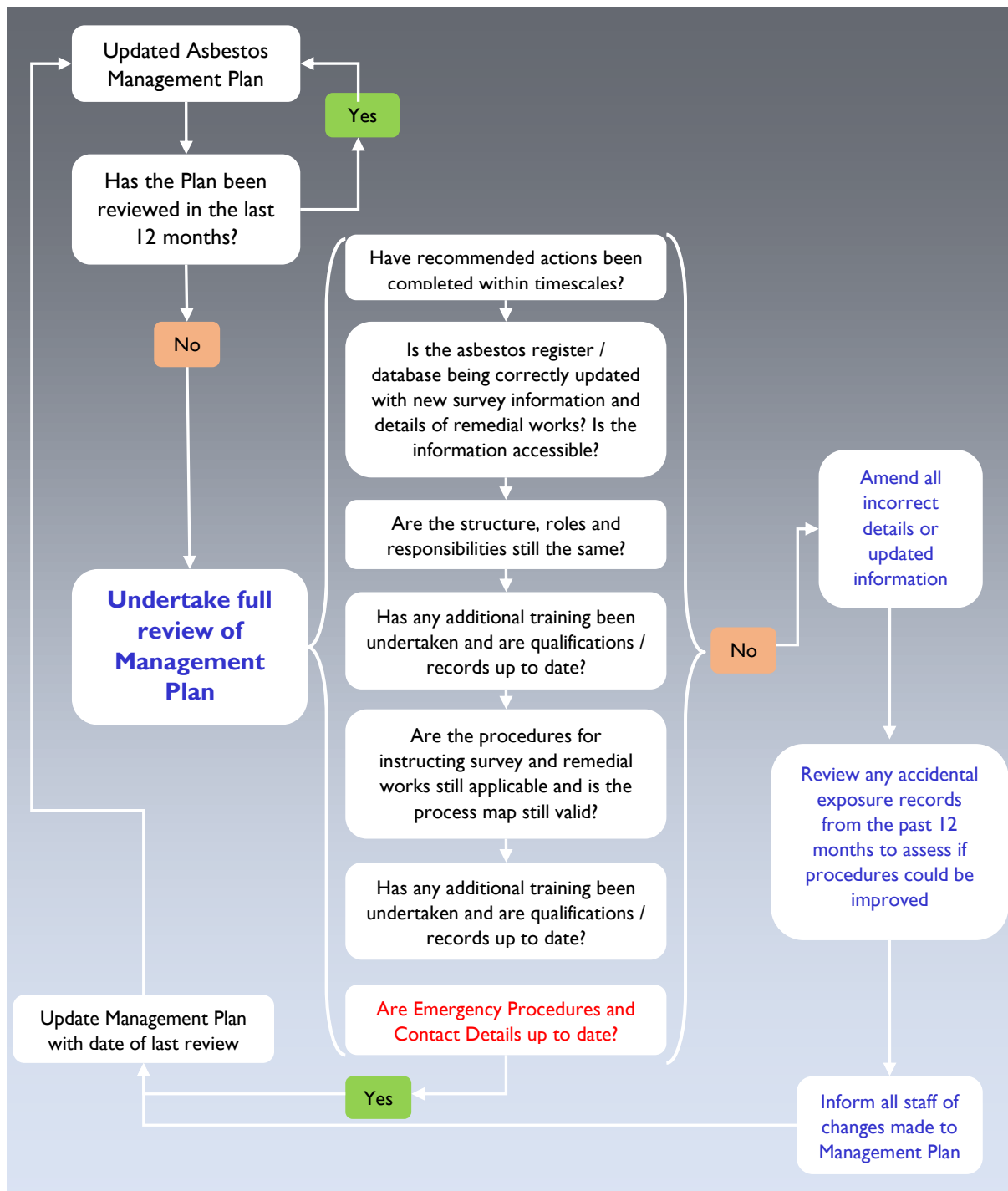
- 13.1 Our definition of non-compliance is any incident which results in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety.
- 13.2 All non-compliance issues should be reported within 24 hours.
- 13.3 Any non-compliance issue identified at an operational level will be formally reported to the Director of Property Services in the first instance.
- 13.4 The Director of Property Services will agree an appropriate course of corrective action with the Head of Building Safety. They will determine if a serious untoward incident report is to be submitted to EMT.
- 13.5 The EMT will ensure the Board are made aware of any non-compliance issue so they can consider the implications and act as appropriate.
- 13.6 In cases of a serious non-compliance issue the EMT and Board will consider whether it is necessary to disclose the issue to the Regulator of Social Housing in the spirit of co-regulation, or any other relevant organisation such as the HSE, as part of the Regulatory Framework.

14 How to Monitor & Review the Management Plan

- 14.1 The key objective of this Plan is to reduce the risk of asbestos exposure. If it can be demonstrated that the risk from ACMs is under control, this Plan will be fulfilling its intended purpose.
- 14.2 To ensure that this Plan remains effective, it will be reviewed at 12 monthly intervals (or sooner if there is a change in regulation, legislation or Approved Code of Practice). This may not mean that any changes are necessary, but rather that all current provisions are appraised, checked and audited so that any changes which may make them more efficient are discussed and implemented where necessary.
- 14.3 The procedure in the flow chart below (Figure 2) should be followed in order to ensure this Plan remains a valid document, and that the risks from asbestos are being adequately assessed.

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 27 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Figure 2 – Maintaining the Asbestos Management Plan



| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 28 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

15 Appendices

Appendix A Asbestos Management Process Maps

- 1a - Request Survey or Removal Process
- 1b - Request Survey or Removal Process - Planned Works
- 2 - Process Following Site Survey
- 3 - Process Following Removal
- 4 - Payment Process
- 5 - Re-Inspection Process

Appendix B Asbestos DIY leaflet

Appendix C SLHD Asbestos in the home booklet

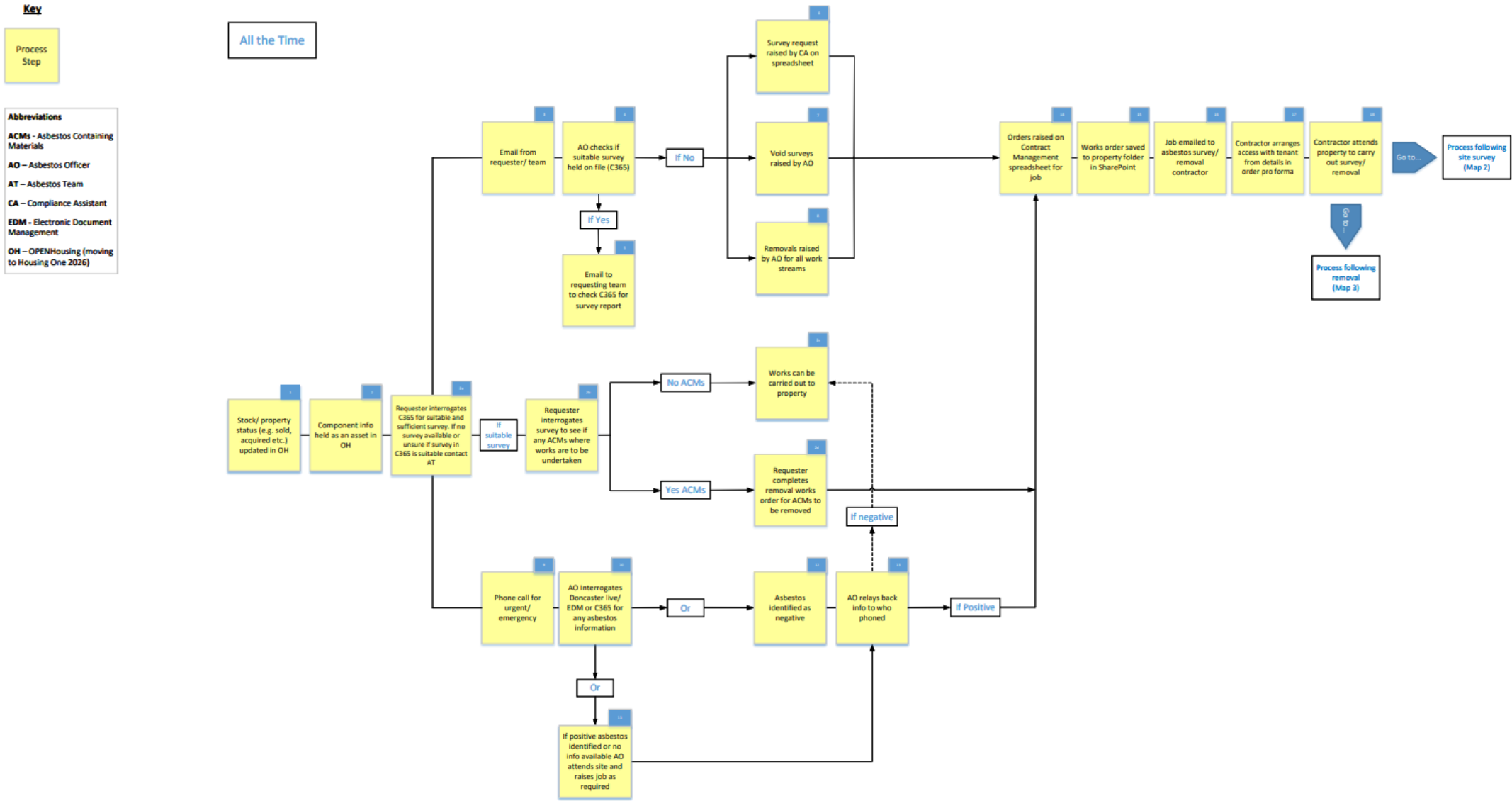
Appendix D Survey Request Form

Appendix E Removal Request Form

Appendix F Example Audit Report

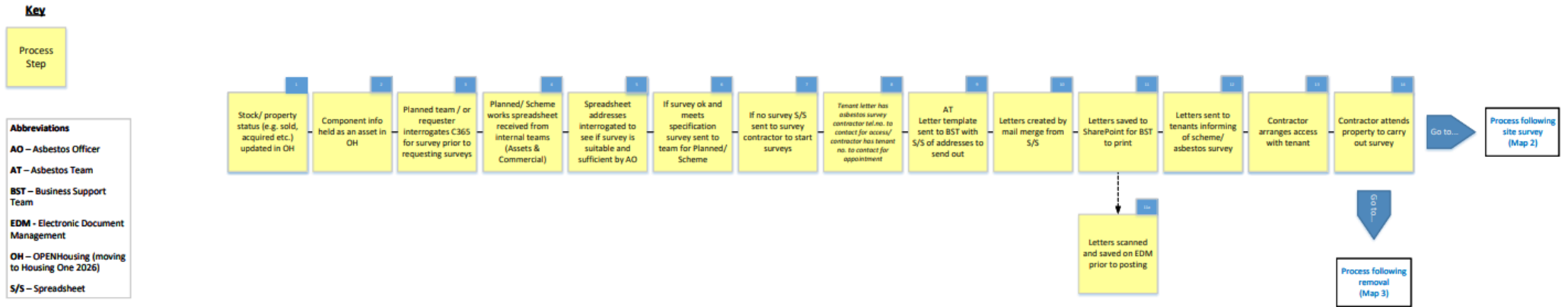
| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 29 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Map 1a. Asbestos Management – Request Survey or Removal Process (Void/ Responsive Works)



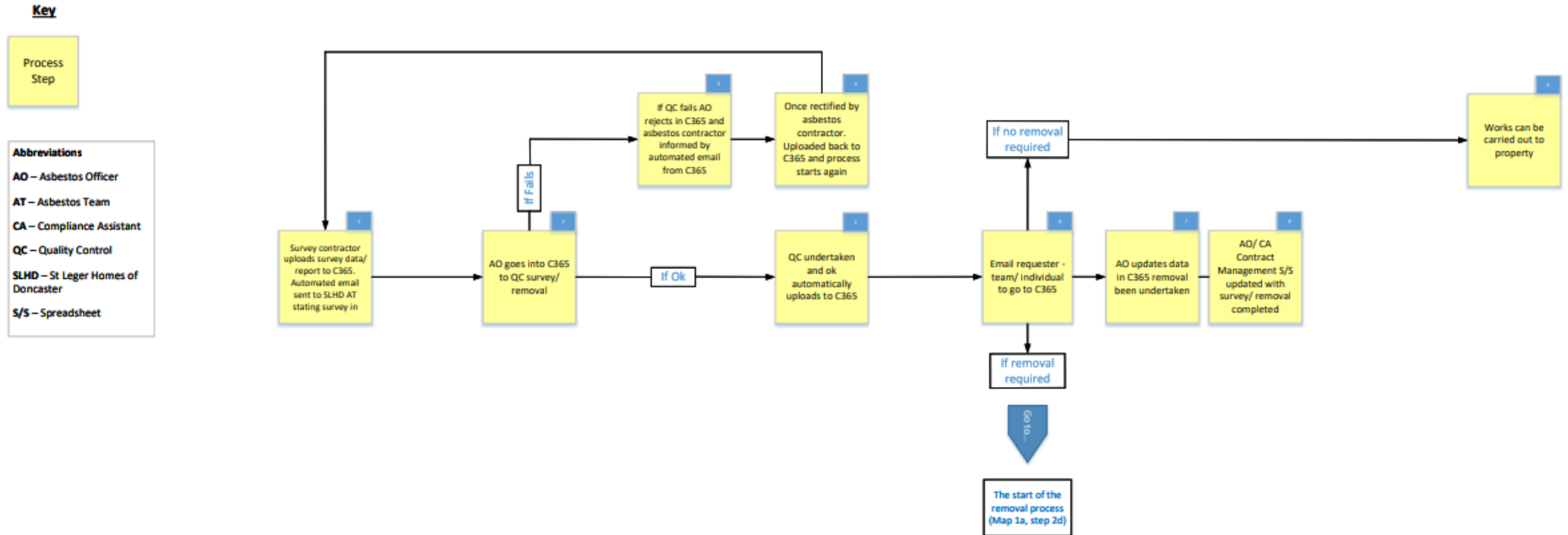
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|---------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 30 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Map 1b. Asbestos Management – Request Survey or Removal Process (Planned Works)



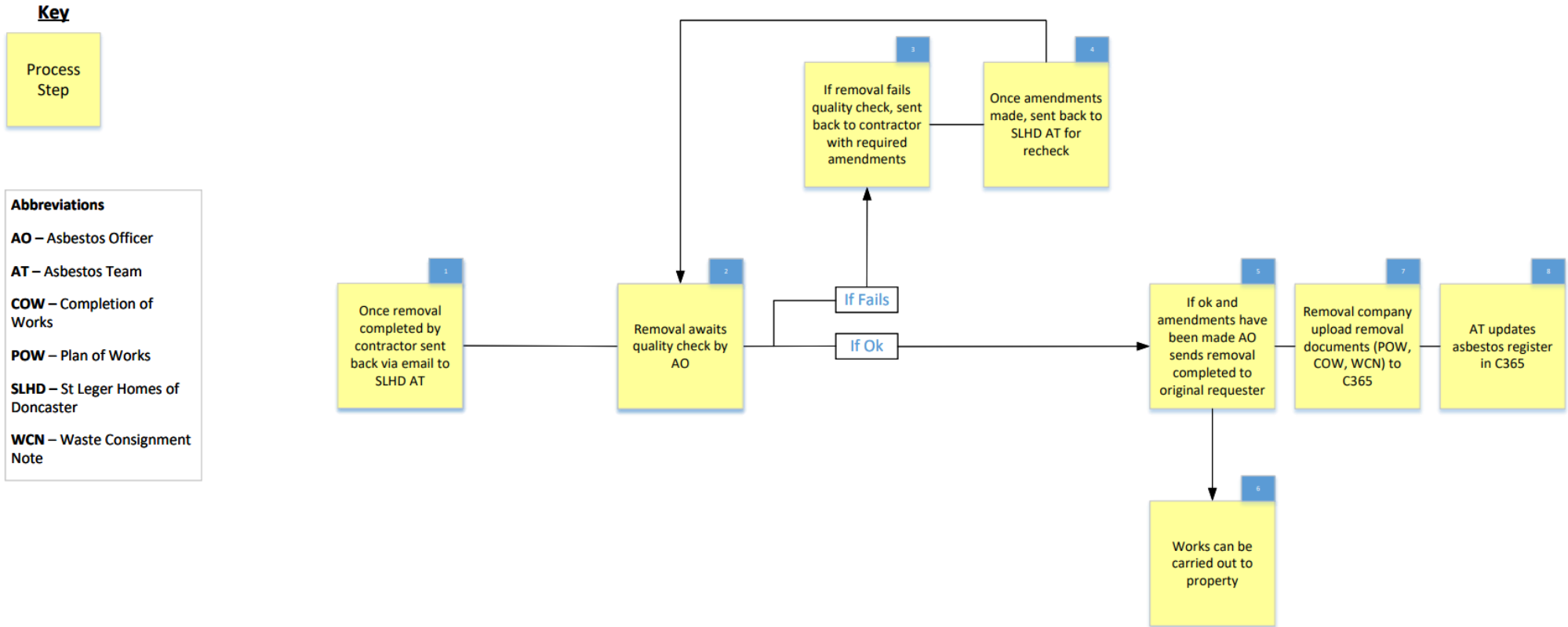
| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 31 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Map 2. Asbestos Management – Process Following Site Survey



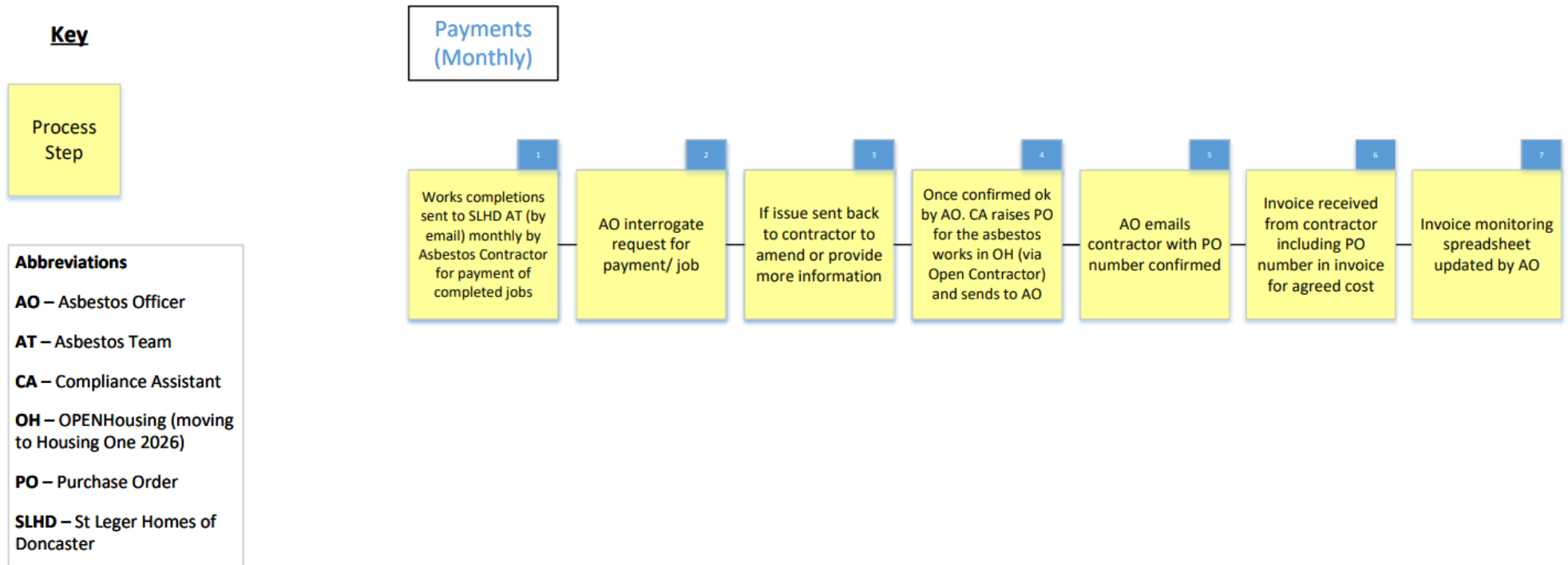
| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 32 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Map 3. Asbestos Management – Process Following Removal



| | | | |
|---------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 33 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Map 4. Asbestos Management – Payment Process



| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 34 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Map 5. Asbestos Management – Re-Inspection Process

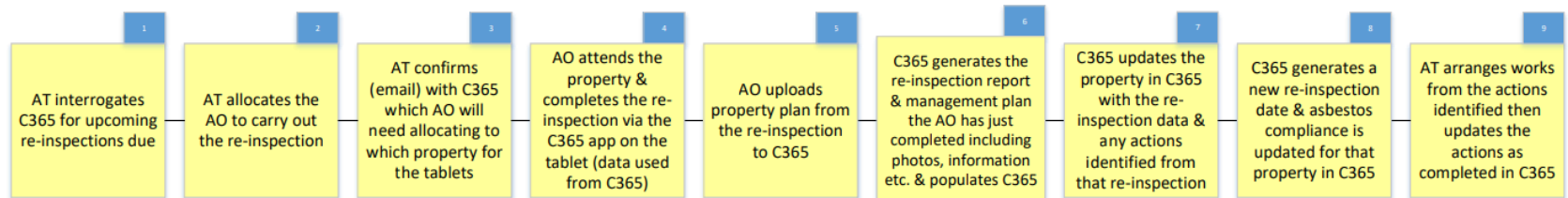
Key

Process Step

Abbreviations

AO – Asbestos Officer

AT – Asbestos Team



| | | | |
|---------------|---------|---------------|-----------------------------|
| Page | Version | Date | Author |
| Page 35 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |

Appendix B Asbestos DIY leaflet

[appendix-b-slhd-asbestos-diy-fact-sheet-april-2023-v3.pdf](#)

Appendix C SLHD Asbestos in the home booklet

[appendix-c-slhd-asbestos-in-the-home-booklet-a5-format-2023-v2.pdf](#)

Appendix D Survey Request Form

[Asbestos SURVEY ONLY Work Order Form 2022-RP V2.docx](#)

Appendix E Removal Request Form

[AsbestosRemoval & Air Test Work Order Form 2022-RP V2.docx](#)

Appendix F Example Audit Report

[55 Laburnum Drive, Armthorpe - survey audit - TTL - 21-Jul-2025.pdf](#)

| Page | Version | Date | Author |
|---------------|---------|---------------|-----------------------------|
| Page 36 of 36 | 2.0 | November 2025 | Asbestos Compliance Officer |