



# Asbestos Management Policy

For HRA-Funded Non-  
Domestic and Domestic  
Property

May 2025



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This document is the responsibility of:

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## 1. Introduction

- 1.1. Although now legally prohibited, the extensive use of asbestos in buildings requires careful continual management. When utilised, asbestos was used for numerous building and construction purposes, such as, fire protection, thermal insulation, roofing, wall cladding paints and decorative plaster.
- 1.2. Given the wide-spread use of asbestos in housing stock, support is needed to ensure that asbestos and asbestos containing materials (ACMs) are carefully managed to ensure asbestos causes no harm to anyone on the premises.
- 1.3. This document sets out Sheffield City Council (SCC)'s policy for managing the risks from ACMs throughout premises that are funded and managed by the Housing Revenue Account (HRA). This policy applies to all parts of SCC's housing stock directly managed by the Housing and Neighbourhood Service.

## 2. Background and Regulatory Landscape

- 2.1. The Control of Asbestos at Work Regulations 2002 introduced a specific duty to manage the risk from ACMS in non-domestic premises. The regulations relating to the control of Asbestos/ the control of Asbestos regulations (CAR) have been continually updated over the past twenty years, and updates are monitored by the Asbestos Team at Sheffield City Council (SCC).
- 2.2. In 2012, the new Control of Asbestos Regulations 2012 (CAR 2012) were introduced. The CAR 2012 included a new duty under Regulation 4/ new Regulation 4 duty to manage asbestos in non- domestic premises; however, a similar duty is implicit under the Health and Safety at Work etc. Act (1974) for domestic premises. Given the overlap, this policy uses the CAR (2012) Regulation 4 model as the reference for managing asbestos in both domestic and non-domestic properties.
- 2.3. The Health and Safety at Work etc. Act (1974) places a duty on employers to take all reasonable steps to ensure that employees and non-employees are not exposed to risks to their health and safety. The risks could arise from the condition of premises or equipment or the way in which the employer undertakes their work. Under Regulation 4 of the Control of Asbestos Regulations 2012 (CAR 2012), SCC recognises that it has a duty to locate, assess, record, manage and monitor the ACMs in those non-domestic premises for which it has the maintenance and repairing responsibility.
- 2.4. For domestic properties, whilst there is no specific duty in the CAR (2012) for SCC to identify ACMs, there is a requirement for SCC to meet the requirements of the Health and Safety at Work etc. Act (1974) and the Management of Health and Safety at Work Regulations (1999).



2.5. This policy also operates within the context of the following legislation, regulations and guidance:

2.5.1. The Workplace (Health, Safety and Welfare) Regulations (1992)

2.5.2. The Construction (Design and Management) Regulations (2015)

2.5.3. Defective Premises Act (1972)

2.5.4. The Environmental Protection Act (1990)

2.5.5. Medical Guidance Note MS 13 Asbestos medical surveillance (2018)

2.5.6. The Special Waste Regulations (1996)

2.5.7. Guidance HSG 247 – Asbestos: The licensed contractors’ guide (2006)

2.5.8. Guidance Note HSG 53 – The selection, use and maintenance of respiratory protective equipment (2013)

2.5.9. Guidance HSG 173 – Monitoring strategies for toxic substances (2006)

2.5.10. Guidance L101 – Safe work in confined spaces (2014)

2.5.11. Guidance HSG 248 - Asbestos: The analysts’ guide for sampling, analysis and clearance procedures (2021)

2.5.12. HSG 264 – Asbestos: The survey guide 2nd edition (2012)

2.5.13. Guidance note EH40/2005 Workplace exposure limits (2020)

2.5.14. Hazardous Waste (England and Wales) Regulations 2005 (Amendment 2009)

2.5.15. Control of Substances Hazardous to Health Regulations (as amended) 2002 (COSHH)

2.5.16. Landlord and Tenant Act (1985)

2.5.17. Data Protection Act (2018)

2.5.18. Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

2.5.19. Homes (Fitness for Human Habitation) Act (2018)

2.5.20. Social Housing (Regulation) Act 2023

### 3. What is Asbestos?

3.1. Asbestos is a common name for a group of naturally occurring fibrous materials which have been commonly used in a range of building and equipment materials



due to the high tensile strength and ability to withstand chemical attacks and temperatures exceeding 100°C.

3.2. There are three main types of asbestos:

3.2.1. Chrysotile (commonly known as white asbestos)

3.2.2. Amosite (commonly known as brown asbestos)

3.2.3. Crocidolite (commonly known as blue asbestos)

3.3. Several thousand household products contained asbestos before legislation came in banning its use in the UK. These items ranged from automotive products like brake pads, to talc products such as makeup or deodorant, to toasters and even hair dryers. Of all the asbestos used in the UK more than 60% was used in buildings.

3.4. Asbestos is likely to be present if the building was constructed or refurbished between 1950 and 1980. Of course, other buildings may possess ACMs. The main uses in buildings were for:

3.4.1. roofing tiles, felt, guttering,

3.4.2. linings for walls, ceilings, and doors,

3.4.3. heat resistant panels for doors, stairways, ceilings, chutes,

3.4.4. thermal insulating panels and boards,

3.4.5. flooring materials,

3.4.6. lagging for boilers and pipes,

3.4.7. central heating ducts,

3.4.8. fire blankets, gloves,

3.4.9. infill panels, fascias, gas fire surrounds, sprayed application to steel work,

3.4.10. boiler houses for thermal insulation and fire protection.

## 4. The Dangers of Asbestos

4.1. The World Health Organisation (WHO) classifies asbestos as a carcinogen. However, ACMs can only pose a risk to health if they are disturbed, and the asbestos fibres become airborne and inhaled. Although it is generally considered that brown and blue asbestos are more dangerous to health than white, all can cause fatal diseases. Therefore, if ACMs are maintained in good condition, there is no need to remove the products. In fact, they may be best left in place and managed.



- 4.2. Generally speaking, the greater the exposure level(s); the greater is the risk to health. The population with the greatest rise, therefore, are those people who worked with asbestos for long periods of time, such as ship-workers, maintenance and building contractors.
- 4.3. There are four main diseases associated with inhalation of asbestos fibres. These are:
  - 4.3.1. asbestosis (a scarring of the lung tissue caused by asbestos),
  - 4.3.2. cancer (mesothelioma and asbestos related lung cancer),
  - 4.3.3. diffuse pleural thickening (a non-malignant disease affecting the lung lining).
- 4.4. It is currently estimated that asbestos related deaths in the UK are between 2,500 and 3,000 per annum. Most of these deaths occur through occupational exposure to asbestos. Despite the ban on ACM use, and knowledge of the dangers, the difficulty with the prediction of asbestos related deaths is that the time from exposure to death is considerable (generally 30-40 years). This time lag has resulted in delays to the legislative process.

## 5. Purpose and scope

- 5.1. This Asbestos Policy sets out how SCC will manage the risks from ACMs and how it aims to prevent anyone from being accidentally exposed to asbestos fibres in SCC housing stock, as well as in some non-domestic premises which are funded and managed by the HRA.
- 5.2. As a landlord, SCC has a legal duty to manage ACMs, in conjunction with maintenance and repairs to homes, communal blocks, and other properties we manage, many of which will have been constructed using ACMs.
- 5.3. The aim is to ensure that SCC has clear and effective arrangements for premises which are funded and managed through the HRA. Council owned assets managed through the HRA can be broken down into two types:

### 5.3.1. Domestic premises

- 5.3.1.1. This policy applies to SCC owned social housing stock. For example, Council Housing single home dwellings, flats, blocks of flats, etc., which are funded and maintained by the HRA. It does not apply to privately owned housing (including those owned by private landlords) or housing owned by Registered Providers of Social Housing or any other social housing providers.

### 5.3.2. Non-domestic premises



5.3.2.1. This policy also applies to HRA funded and managed assets such as community meeting rooms, neighbourhood offices, boiler rooms, and communal areas in blocks of flats, to name a few.

5.4. This policy applies to all employees, residents, contractors, stakeholders, and other persons who may work on, occupy, visit, or use these premises, or who may be affected by our activities or services.

5.5. This policy works alongside SCC's other policies and processes around health and safety and compliance.

5.6. To meet this aim SCC will:

5.6.1. Assign specific responsibility for managing asbestos risks in all non - domestic Council Housing & Neighbourhood Services premises for which SCC has a duty to manage the asbestos to the relevant officer as set out in section 7 of the policy.

5.6.2. Establish procedures for managing asbestos in all such premises.

5.6.3. Extend the above responsibilities and procedures to include domestic properties, thus discharging the general duty of care arising from The Health and Safety at Work etc. Act (1974) and the Management of Health and Safety at Work Regulations (1999).

5.7. We will also adopt a four-year plan where:

5.7.1. We will maintain a comprehensive register of ACMs within the housing stock and utilise technology to its full advantage to ensure information is widely shared with staff, contractors and tenants.

5.7.2. We will re-inspect ACMs annually, biannually, or every four years based on the perceived risk following the risk assessment outlined in the Asbestos: Survey Guide Health and Safety Executive (HSE), p. 39-40). This risk assessment looks at the location of the material; extent of the material; the use to which the location is put; the occupancy of the area; the activities carried on in the area; the likelihood/frequency with which maintenance activities are likely to take place (HSE, p. 39-40).

5.7.3. Clearly and appropriately label all ACMs in non-domestic locations where practicable.

5.7.4. Put in place arrangements to monitor and control the risks from work involving asbestos.

5.7.5. Provide an appropriate level of information and training for those with duties under the policy and those exposed to risk.





## 6. Main Policy Objectives

- 6.1. To prevent or reduce to the lowest practicable level, the exposure of ACMs to employees, residents, tenants, contractors, visitors and/or the public, to airborne asbestos fibres whilst working in, occupying or visiting SCC HRA owned or managed housing, premises or office buildings.
- 6.2. To implement effective asbestos management procedures throughout SCC.
- 6.3. To comply with all statutory provisions relating to the management of ACMs so far as is reasonably practicable.
- 6.4. To identify and record, so far as is reasonably practicable, the location, extent and condition of asbestos materials present in SCC and HRA owned or managed building stock and office buildings.
- 6.5. To assess the risks presented by identified ACMs in SCC HRA owned or managed building stock and office buildings and to use these assessments to prioritise any required remedial action.
- 6.6. Depending on risk assessment results, the general policy will be to leave ACMs 'in situ'. Such a policy is supported by the Health and Safety Executive (HSE).
- 6.7. To provide information relating to the location of ACMs to tenants, contractors and any other person who may disturb them.
- 6.8. To maintain and manage a 'No Asbestos Survey No Work Policy' for all works other than day to day responsive repairs.
- 6.9. To ensure that any works relating to asbestos undertaken in SCC HRA owned or managed premises or office buildings are only carried out by competent personnel. This includes day to day responsive repairs.
- 6.10. To, wherever practicable, reduce the risk from identified asbestos materials by effective treatment or removal and replacement.
- 6.11. To provide appropriate training for staff to achieve nationally recognised qualifications from the British Institute of Public Hygienists for those employees who are obliged to work with or on asbestos materials as part of their designated duties and their supervisors and any employees who may potentially disturb ACMs.
- 6.12. To systematically re-inspect ACMs left in situ in future years to reassess the risks associated with the material and its continuing presence in a building/location. Such a re-inspection regime is based on a risk assessment from the initial asbestos survey records stored in the asbestos database. Depending on the level





of risk, reinspection in communal areas is done every four years, two years, or year.

- 6.13. To ensure that all asbestos licensed materials are only removed by suitably licensed asbestos removal contractors that have been thoroughly vetted prior to commission (L143).
- 6.14. To ensure that all non-licensed materials are only worked around/adjacent to or removed by competent persons who will have been trained to carry out such tasks (L143).
- 6.15. To ensure that all comply with the new category of non-licensed work (for clarity this new category of work will be referred to as 'Notifiable Non-Licensed work' (NNLW)).
- 6.16. Complying with this policy and coordinating management plan/ procedure will ensure that SCC fulfils its legal obligations under the Health and Safety Act Work etc. Act 1974 (HSWA), the Management of Health and Safety at Work Regulations (MHSWR, 1999) and L143 Regulation 4. This policy is intended to be the minimum standard for the organisation.

## 7. Responsibilities and Dutyholders

- 7.1. 'Dutyholder'
- 7.2. For the purposes of this policy in and in accordance with CAR (2012), the 'dutyholder' shall be the Director of Housing with their nominated Officer being the Head of Housing Investment & Repairs.
- 7.3. The Manager Health, Safety & Wellbeing has a responsibility to manage the risks from ACMs both in the offices occupied by employees and in the housing stock managed on behalf of Sheffield City Council.
- 7.4. The dutyholder is responsible to manage asbestos, as outlined in Regulations 4 and 5 of the CAR 2012.
  - 7.4.1. Regulation 4 of CAR 2012 requires dutyholders to identify the location and condition of asbestos in non-domestic premises 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 people who have a duty to co-operate with the main dutyholder to enable them to comply with the regulation. Non-domestic premises includes the common parts of domestic premises (As referenced in the HSE, Managing and Working with Asbestos (MWA), CAR 2012, and the Approved Code of Practice and Guidance, p. 26).
  - 7.4.2. In addition to this policy, the Council has a management plan, which identifies where an ACM is located and how it will be managed to prevent



exposure to asbestos, including to contractors and other workers who may carry out work on the fabric of the building that could disturb the ACM (As referenced in HSE (MWA, p. 27)).

## 8. Training

- 8.1. Through training and awareness sessions, SCC aim to have an open and responsive culture where employees and contractors have a good understanding of the risks of ACMs and their ability to manage them in their place of work. All employees will be invited to participate in asbestos awareness training as part of their induction and provided with information on what to do if asbestos is disturbed.
- 8.2. Training is also required for specific staff involved in the maintenance of the housing stock and should cover:
  - 8.2.1. Understanding asbestos surveys,
  - 8.2.2. How to access and search for surveys on Technology Forge (TF) (or other database),
  - 8.2.3. What to expect from maintenance contractors,
  - 8.2.4. The process to report an exposure; the contacts to notify in the event of an exposure,
  - 8.2.5. The roles and responsibilities of SCC staff.
- 8.3. Additional and more specific training will be provided to SCC staff with management responsibility for asbestos, this will include, but not be limited to:
  - 8.3.1. Conducting Risk Assessments
  - 8.3.2. Assessing the competence of external survey providers/asbestos removal contractors
- 8.4. In addition to the above, specific staff will be required to achieve the following qualifications:
  - 8.4.1. Asbestos surveyors will be expected to achieve the P402 qualification accredited by the British Institute of Public Hygienists.
  - 8.4.2. Staff managing the Asbestos Team will be expected to achieve the P405 qualification accredited by British Institute of Public Hygienists.
  - 8.4.3. The Head of Housing Investment & Repairs will work with the Employee Development Unit to ensure that up to date records are kept on staff completion of asbestos training and refresher dates are scheduled.



8.4.4. SCC will ensure that all external trainers are UKATA trainers (the UK Asbestos Training Association).

8.4.5. Contractors are expected to deliver training for their own staff which satisfies the client's requirements for the safe management of asbestos. This includes the general training highlighted above but the contract managers will also ensure that all staff:

8.4.5.1. Know what asbestos products are and where you are likely to find them.

8.4.5.2. Are aware of contractors' own process for checking for ACMs before starting work on a building project which may potentially disturb them.

8.4.5.3. Managers will ensure that staff are aware of and trained in the safe working procedure methods for working on ACMs (HSE, Asbestos Essentials, 2018). The Task Manual published by the HSE should be followed by all contractors.

8.4.5.4. Can safely and competently use Personal Protective Equipment (PPE) and Respiratory Protective Equipment (RPE).

8.4.5.5. Ensure that only authorised and trained staff can carry out licensed and non-licensed asbestos removal.

8.4.5.6. Ensure that staff can read and understand an asbestos report.

8.4.5.7. Ensure that staff are trained to use electronic methods, including handheld technology, to access asbestos survey information.

8.4.6. All contractors and subcontractors must provide documentary evidence that all their employees have undertaken asbestos awareness training/licensed training. Surveyors carrying out asbestos surveys for contractors must have achieved P402.

## 9. Four-year Survey Programme and Management Plan

9.1. SCC are continuing to carry out a programme of asbestos surveys to comply with the requirements of legislation, the business needs associated with the four-year investment plan, priorities identified by hazard algorithm scores, best practice and SCC policy.

9.2. The programme has several strands more of which can be found in the Council's internal Asbestos Management Plan and Process at Appendix 9. The plan covers non-domestic communal areas and domestic properties.



- 9.3. We have identified over 741 domestic estate archetypes for asbestos management purposes, and we hold 100% of surveys for 260 estate archetypes and over 99% of surveys for 670 archetypes.
- 9.4. The Decent Homes programme provided the opportunity to obtain a management survey or Type 2 survey of most homes; however, the future survey programme has been developed to respond to responsive repairs requirements and voids. If after checking TF a survey is not located, then a one-off survey will be commissioned and recorded onto TF.
- 9.5. We are also taking the opportunity of using the void period when work can often be more destructive to improve our archetype records by carrying out at least one refurbishment and demolition survey on each type. This is the most practicable way of improving our data without disturbing tenants but there will be some additional remedial work costs.
- 9.6. Newly acquired and leased properties will also fall under scope of this policy and survey programme. The vendor or landlord must provide the Council with sufficient information (e.g., drawings, surveys and the like), to establish whether ACMs are present.
- 9.7. SCC is committed to locating and checking the condition of asbestos in every asset.

## 10. Asbestos surveys

- 10.1. To fully discharge the duties imposed on SCC by the CAR (2012), arrangements have been put in place to identify ACMs within:
  - 10.1.1. Nondomestic properties and the common areas of our housing stock funded and managed by SCC through the HRA
  - 10.1.2. Domestic properties managed by SCC through the HRA
  - 10.1.3. Area Housing Offices managed by SCC through the HRA
- 10.2. While there is no specific duty in the CAR (2012) regarding domestic properties, there is a need for the Council to meet the requirements of the HSWA (1974), and the MHSWR (1999). To meet these requirements, full Type 2 or management asbestos surveys have been carried out on all capital and major works on 99.9% of our properties. In this section, we consider the potential compliance issues raised by the second edition of the HSE Asbestos: The Survey Guide, HSG 264 (2012).
- 10.3. The Aim of Asbestos Surveys for SCC is:
  - 10.3.1. To record the location and condition of asbestos and presumed ACMs.



10.3.2. To Assess (and record) the risk of anyone being exposed to these materials.

10.3.3. To prepare a plan to manage the risks, ensuring that:

10.3.4. Any known or presumed asbestos material is kept in good repair, and any material deemed to present a risk, because of its condition or location, is repaired, sealed, or removed safely and efficiently.

10.3.5. Information is given to those likely to be at risk.

10.3.6. They, as dutyholder, understand and fulfil their responsibilities as defined in the HSE L143 (CAR, 2012).

10.4. An asbestos survey has three main elements:

10.4.1. It must, as far as is reasonably practicable, locate and record the extent, location, and product type of any presumed or known ACMs.

10.4.2. It must inspect and record information on the accessibility, condition, and surface treatment of any presumed or known ACMs.

10.4.3. It should determine and record the asbestos type, either by collecting representative samples of suspect materials for laboratory identification, or by making a presumption based on the product type and its appearance, etc.

10.5. The survey report will contain material assessment algorithms as shown in Appendix 3 of the Council's internal Asbestos Management Plan and Process. The surveyor will provide this assessment as part of the report. The use of material assessment algorithm allows asbestos containing material to be scored and ranked in order of their ability to release fibres. This information will assist in the short, medium, and long-term management of asbestos based upon the risk presented.

10.6. Unless the pre survey risk assessment stipulates otherwise, a management survey will be sufficient for the development of the asbestos management plan.

## 11. Asbestos register

11.1. Identifying and checking the condition of asbestos within the housing stock is an on-going process, the data and the information it has provided has been used and shared to manage the risks of asbestos exposure. HSG 264 (2012) establishes the level of compliance that should be achieved by social landlords and the parameters for collecting housing related data.

11.2. An asbestos register has been maintained since 2008 and is in a continual process of improvement. By end of 2022/23 99.7% domestic locations managed



by the Housing & Neighbourhood Service had a record within the online management database, TF, to show the location of any asbestos hazard.

- 11.3. SCC do not use asbestos surveying companies that are not UKAS (United Kingdom accreditation Service) accredited, and they check all asbestos surveys before they are loaded into the asbestos register.
- 11.4. The online database now holds a high and increasing number of material assessment algorithms. The surveying of ACMs utilising the HSG 264 methodology allows for each location of an ACM to be given a risk rating. This risk rating for each location allows Council Housing & Neighbourhood Services to identify the high-risk areas and develop plans on how that risk should be managed including, considering removal.
- 11.5. Since 2008, Housing & Neighbourhood Services at SCC have used the information collected to produce an asbestos archetype book which utilises all the information from surveys including material sample results, records from asbestos stripping, photographs and the local knowledge of experienced and qualified asbestos surveyors. These formed the archetypes which are still used to this day.
- 11.6. Although this book has provided a wealth of data, we do not have consistent coverage across all archetypes. The resulting asbestos archetype book is therefore to be used as a useful guide to potential asbestos only.
- 11.7. We plan to address the gaps in data by obtaining additional demolition survey information on all missing archetypes. Where reactive maintenance is carried out which is not intrusive and there is no survey for that property then the archetype book provides valuable information.

## 12. Communication and consultation

- 12.1. New tenants will be given a copy of their asbestos survey and an asbestos safety leaflet which gives advice and basic precautions.
- 12.2. SCC will provide asbestos safety advice following a property survey, or where works are necessary, information will be shared in various ways with the tenants affected.

## 13. Monitoring and continual improvement

- 13.1. The Asbestos Team will monitor the implementation of and compliance with this policy, in consultation with relevant stakeholders, along with asbestos survey performance indicators, and any significant issues.



- 13.2. More detail on the monitoring and continuous improvement of ACMs are included for SCC staff and contractors in the Asbestos Management Plan and Process, which is updated annually, when there is a change of process, new rules and regulations, or where there are lessons learned.
- 13.3. The Asbestos Policy will be reviewed where there is a change of process, lessons learned, and/or whenever there is new regulations or legislation.

