

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

PRHA Asbestos Policy and Management plan



Index

Asbestos Policy	Pages 2-4
Asbestos Management Plan	Pages 5-8
Asbestos Action Plan (monthly review)	Pages 9-11
Asbestos Inspection Form	Page 12
PRHA Asbestos Register	Pages 13-16

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

PRHA Asbestos Policy

This policy sets out our approach to managing risks associated with asbestos and asbestos-containing materials in buildings owned or managed by us. This includes residential premises, communal areas in residential buildings and on wider estates.

2. Aims of this Policy

The Asbestos Management Policy details how PRHA fully complies with the Control of Asbestos Regulations (CAR) 2012. In addition to the policy, we have an **Asbestos Management Plan** that documents the controls in managing asbestos safely and an Asbestos Register which holds records of the assets with Asbestos Containing Material (ACMs).

PRHA recognises that the main hazard in relation to asbestos is the non-identification of asbestos and the presence of ACMs and as such will protect those potentially exposed to asbestos as far as is practical by minimising the exposure using appropriate control measures and working methods. PRHA accepts that asbestos is likely to be present in many of its properties built prior to the year 1999 and will therefore manage these properties accordingly.

PRHA will follow a systematic approach to the management of asbestos to ensure it meets the requirements set out in the Control of Asbestos Regulations 2012 and other relevant legislation. This is to ensure the safety of employees, tenants, contractors and other persons and stakeholders. This policy will be used to formulate PRHA Asbestos Management Plan (AMP).

3. Definitions

Asbestos - Asbestos is the general term used for naturally occurring fibrous minerals that have crystallised to form fibres. Asbestos fibres do not dissolve in water or evaporate, they are resistant to heat, fire, chemical and biological degradation and are mechanically strong. The main types of asbestos commonly used in construction prior to 1999 are:

- crocidolite (commonly known as blue asbestos)
- amosite (commonly known as brown asbestos)
- chrysotile (commonly known as white asbestos)

Asbestos Containing Material (ACM) - Refers to any material containing asbestos.

Licensed contractors - The HSE only allows certain works on ACM to be carried out by contractors. Contractors will only be issued with a 'licence' if they can demonstrate that have the necessary skills, competency, expertise, knowledge, and experience of work with asbestos, together with excellent health and safety management systems.

Management survey – A survey to locate as far as is practical the presence and extent of asbestos containing materials in a property which could be damaged

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

or disturbed by normal occupancy and to assess their condition. This is the principal survey used to populate the asbestos register.

Refurbishment and Demolition surveys – A more detailed survey required before any work is carried out and asbestos materials are likely to be disturbed as part of a refurbishment or demolition project.

Re-inspection surveys – A re-inspection of management surveys and are used to monitor the condition of any identified asbestos containing materials.

4. Regulator for Social Housing – Regulatory Standards

Home Standard (Quality of Accommodation and Repairs and Maintenance)

We will ensure that we meet all our legal responsibilities under the relevant and current compliance legislation for the health and safety of occupants in their homes.

5. Policy Approach

PRHA will manage – as far as reasonably practicable – all asbestos containing materials (ACM) falling under its control in such a manner as to minimise the risk of any person being exposed to asbestos fibres. We will aim to achieve this policy by:

- Identifying ACM within our buildings. Where it is not reasonably practicable to identify ACM, for example ACM that may be in inaccessible areas, then PRHA will presume that asbestos is present and manage accordingly.
- Risk assessing each identified ACM considering the likelihood, and the number of people that might be exposed, in the event of an uncontrolled release of asbestos fibres.
- Implementing appropriate control measures to reduce the risk of exposure of people to asbestos fibres from each ACM. The following general principles will be applied:
 - Where ACM is assessed as being in good condition then this will generally be left in situ and managed.
 - Where ACM is assessed as posing a risk to health it will be, as far as is reasonably practicable, removed or encapsulated.
 - Where removal or encapsulation are not reasonably practicable then access to the ACM will be managed to reduce the risk of exposure to as low as is reasonably practicable.
- Implementing a system of monitoring of each remaining ACM at intervals determined by the risk assessment.
- Carrying out a Refurbishment and Demolition (R&D) survey as an integral part of the planning process for any refurbishment or demolition works carried out in PRHA owned, managed, or occupied premises.
- Planning, managing, delivering, and monitoring all work that could result in the release of asbestos fibres. In the case of works that involve the removal or encapsulation or other activities that will lead to the release of asbestos fibres, regardless of asbestos type, these will only be carried out by

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

organisations licensed to carry out such works by the Health and Safety Executive (HSE).

- Devising and implementing emergency procedures to reduce the risk of exposure of people as low as is reasonably practicable in the event of an unplanned and/or uncontrolled release of asbestos fibres.
- Review this policy and any associated procedures at regular intervals, or following any uncontrolled release of asbestos fibres, to ensure that it is working efficiently and effectively.

6. Duties of Employers and Landlords

To comply with the Control of Asbestos Regulations (CAR) 2012 and other relevant legislation relating to asbestos PRHA will:

- Appoint competent and qualified Responsible Person(s) to coordinate the management of asbestos.
- Take reasonable steps to find materials likely to contain asbestos.
- Presume materials contain asbestos, unless there is strong evidence to support that the material is not ACM.
- Assess the risk of likelihood of anyone being exposed to asbestos from these materials.
- Make a written record of the location and condition of ACMs and presumed ACMs and keep it up to date.
- Repair or remove any material that contains or is presumed to contain asbestos, if necessary, because of the likelihood of disturbance or its location or condition.
- Prepare a plan that manages the risk and put into effect to ensure that Information on the location and condition of ACMs is given to people who may disturb them and any material known or presumed to contain asbestos is kept in a good state of repair;
- Monitor the condition of ACMs and presumed ACMs; and Review and monitor the management plan and the arrangements made to put it in place.

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

The Asbestos Management Plan (Procedure and Management Action Plan)

The Asbestos Management Plan should be read in conjunction with the Asbestos Policy. The plan details the measures that are in place to identify, manage and/or mitigate risks associated with asbestos.

The Asbestos Management Plan is relevant for maintaining a safe environment for all residents, employee, and contractors. It is designed to be a 'live document' that is to be regularly reviewed, amended, and updated as changes happen within the organisation and its operating processes.

The Asbestos Policy and Asbestos Management Plan will assist PRHA in ensuring compliance with asbestos in accordance with the Control of Asbestos Regulations (CAR) 2012.

1. Asbestos Register

PRHA holds information on ACMs on the Asbestos Register. This register has been developed and holds surveyed data on 100% of our properties as of August 2025. This information is held in folder G:\CMT\Building information –do not destroy (master), G:\Property Services\Asbestos.

2. Responsive, Void and Planned Maintenance Works

Non-Domestic Properties (communal)

PRHA will review existing asbestos management survey information prior to carrying out any responsive, void, or planned maintenance works which may involve working on or adjacent to any ACMs within a non-domestic (communal) property. This is to ensure that any ACMs likely to pose a risk are identified prior to works commencing and the details passed onto the relevant in-house operatives or external contractors and managed in an appropriate way.

PRHA will ensure that all non-domestic (communal) properties in ownership or management have an asbestos management survey and will be re-inspected annually or at a period dictated by the previous survey/re-inspection. Re-inspection dates may change following the re-categorisation of a property or a building.

- **Domestic Properties**

PRHA will review the asbestos register and any existing asbestos survey information prior to carrying out any responsive, void, or planned maintenance works which may involve working on or adjacent to any ACMs within a domestic property. This is to ensure that any ACMs likely to pose a risk are identified prior to works commencing and are managed and dealt with appropriately. Where intrusive works is to be undertaken a Refurbishment and Demolition survey (R&D) will be undertaken. Where there is no record of asbestos related information for a domestic property, a survey will be undertaken ahead of any works taking place should the contractor work within proximity of potential ACM.

Refurbishment Work

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

PRHA will carry out Refurbishment and Demolition survey prior to any refurbishment or demolition work. If the refurbishment works are restricted to small areas e.g. kitchen or bathroom replacement, then a localised survey of the areas likely to be affected may be completed and not the entire building.

3. Asbestos Remedial Work

PRHA will ensure there is a robust process in place for the management of any follow-up works required following the completion of an asbestos management survey.

PRHA will ensure that following asbestos surveys, any asbestos containing materials that are found to be in a poor condition or that are likely to be regularly/easily damaged or disturbed through the normal use of a dwelling will be repaired, protected, or removed at the earliest opportunity.

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

Where asbestos is positively identified and because of a risk assessment removal, sealing or encapsulation is recommended, this will be carried out for:

- **Non-licensed works** – as defined in regulation 2 of the CAR 2012 – by specifically trained contractors with appropriate equipment and working procedures in place which are sufficient to comply with the CAR 2012.
- **Notifiable non-licensed works** – as defined in regulation 2 of the CAR 2012 – by a licensed asbestos removal contractor (LARC) licensed by the Health & Safety Executive in compliance with the CAR 2012.
- **Licensed works** - as defined in regulation 2 of the CAR 2012 – by a licensed asbestos removal contractor (LARC), licensed by the Health & Safety Executive in compliance with the CAR 2012.

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

4. Asbestos Information & Communication

PRHA considers good communication essential in the safe delivery of asbestos management and will therefore ensure that information about asbestos containing materials (known or suspected) is provided to every person liable to disturb it.

PRHA will ensure all employees and contractors have adequate asbestos survey information to enable them to manage and/or work safely with asbestos.

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

5. Record Keeping

PRHA has an established and maintained Asbestos Register which details every non-domestic (communal) and domestic property.

The Asbestos Register is used to record the details of all asbestos surveys undertaken on PRHA properties. This will include the date of the inspection, the findings from the survey, any remediation works identified and subsequently completed. The register will also record the date of any subsequent re-inspection.

6. Non-Compliance / Escalation Process

Any non-compliance issue identified at an operational level will be formally reported to the Assistant Director: Resident Services in the first instance.

The Assistant Director: Resident Services will agree an appropriate course of corrective action with the operational team to address the non-compliance issue and report details of the same to the CEO/Senior Leadership Team, which will consider the implications and act as appropriate.

7. Performance Indicators and Reporting

Key performance indicator (KPI) measures will be established and maintained to ensure PRHA is able to report on performance in relation to asbestos management.

KPI measures will be produced and provided to the CEO BS monthly meeting and each Board meeting KPIs to be included in the Building Safety Report. As a minimum, these KPI measures will include reporting on the total number of:

- Blocks requiring asbestos surveys/re-inspection
- No. of blocks with valid asbestos survey/re-inspection

8. Training

PRHA will ensure that:

- Leaders, and Supervisors whose services area has direct contact with asbestos materials will undertake Duty to Manage (Appointed Person) Asbestos Training.
- Employees who have direct, or potentially indirect, contact with asbestos materials will complete Asbestos Awareness Training.
- Competent (UKAS accredited) contractors and surveyors are procured and appointed to undertake asbestos management surveys on its stock. HSE strongly recommends the use of accredited contractors and surveyors (UKAS accredited).
- AD Resident Services has the responsibility to check the competency of contractors and surveyors on an annual basis.
- Competent licensed asbestos removal contractors (LARC) are procured and appointed for all notifiable non-licensed work or licensed works.

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

- AD Resident Services has the responsibility to check the relevant qualifications of employees working for these contractors on an annual basis.

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

Asbestos Management Action Plan 2025-2026

Part A: Action Plan

Part B: PRHA ANNUAL Check Sheet for Asbestos-Containing Materials (ACM)

Part C: Asbestos Register

	Action required	Priority H/M/L	Target date	Responsible person	Date completed
A	Annual inspection of all areas with identified asbestos. To include checks on disturbance, checks on any works raised on affected areas	H	1/9/25	AD Resident Services / Building's coordinator	
B	Sharing PRHA asbestos register with workers or contractors doing maintenance work. Action to share to full property services team: SJH	H	1/9/25	AD Resident Services / Building's coordinator	
C	Investigate flag on Omni to alert the presence of Asbestos	H	1/10/25	AD Resident Services	
D	PRHA control arrangements to ensure that ACMs are not disturbed	H	1/9/25	AD Resident Services	
E	Training schedule: AD Resident Services Buildings coordinator & Maintenance Manager Maintenance operatives	H	1/11/25	Dir Ops	
G	Review of action plan and monitoring: to be presented to each monthly building safety meeting. KPIs to be reported to the board in the Board building safety report	H	1/9/25	AD Resident Services: Dir Ops	

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

	Action required	Priority H/M/L	Target date	Responsible person	Date completed
H	Culham – Sash cords may contain asbestos fibres (presumed) only to be removed/repared after inspection by professionals. Advise all PS & HT staff and contractors	H	1/9/25	AD Resident Services / Building's coordinator	
I	Culham access to external areas not available (hallway cupboards and balconies so presume may contain asbestos (others that were inspected did not) – advice to staff/contractors	H	1/9/25	AD Resident Services / Building's coordinator	
J	Sonning House: 1: presumptive: Cement flue to the right of the hatch 2: presumptive: Cement shuttering around flue pipe Annual review item: these items should be incorporated into the asbestos management plan until removal prior to either demolition or refurbishment	H	1/9/25	AD Resident Services / Building's coordinator	
K	Sonning House Paper lining to redundant strawboard: remove as soon as is practicable. Removed during comparison works (confirm)	H	8/9/25	AD Resident Services / Building's coordinator	
L	Culham access to external areas not available (hallway cupboards and balconies so presume may contain asbestos (others that were inspected did not) – advice to staff/contractors	H	1/9/25	AD Resident Services / Building's coordinator	

	Action required	Priority H/M/L	Target date	Responsible person	Date completed
--	-----------------	-------------------	----------------	--------------------	-------------------

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

M	Club Row/Old Nichol Street: Presumptive: roof tiles may contain Chrysotile: Annual review item - Annual inspection required to identify any deterioration - Ensure no access for residents to loft space - Ensure staff contractors are aware	H	1/9/25	AD Resident Services / Building's coordinator	
N	Drapers: Fire Places not to be disturbed	H	1/9/25	AD Resident Services / Building's coordinator	
O	Drapers: Remove roof to disused toilet block: check roof annually	M	2026	AD Resident Services / Building's coordinator	
P	Drapers; Presumed fibre in adhesive under parquet floor. Encapsulated. Not to be disturbed – give advice to contractors	H	1/9/25	AD Resident Services / Building's coordinator	

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

PRHA ANNUAL Check Sheet for Asbestos-Containing Materials (ACM)

Staff name:

Job Title

Date Inspected:

Process: at foot of this checklist

Location	Description	Current condition: including signs of disturbance: evidence of damage to area	Works carried out on area during year (Yes/No*)	Any other action required (if n/a please state)	Date follow up action completed (if n/a please state)
Sonning House	1: presumptive: Cement flue to the right of the hatch				
	2: presumptive: Cement shuttering around flue pipe				
	Paper lining to redundant strawboard: remove as soon as is practicable. Removed during comparison works (confirm)				
Club Row	Presumptive: roof tiles may contain Chrysotile. Annual inspection required to identify any deterioration				
Drapers	Toilet block roof – inspect				

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

- a) Review Asbestos survey report in Property Services folder: G:\Property Services\1. COMPLIANCE REGISTER\ASBESTOS register for property and locate presumptive ACM as indicated on table above.
- b) Visit site and take photo of presumptive ACM from same angle.
- c) Save photo in G:\Property Services\1. COMPLIANCE REGISTER\ASBESTOS register under relevant scheme name
- d) Assess current condition- and complete check sheet
- e) Record follow on actions as require and log with AD Resident Services and PRHA Building Safety Officer
- f) Save completed annual check sheet G:\Property Services\1. COMPLIANCE REGISTER\ASBESTOS register\1 Annual checks on Presumptive ACM and pass completed copy to AD Resident Services and PRHA Building Safety Officer

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

b)

ASBESTOS REGISTER REVIEWED August 2025

PROPERTIES WITH ASBESTOS SURVEY AND FOLLOW UP ACTION

Property	Construction/ refurbishment year	Identified issues	Comments
Culham House	1890/2004	Sash cords may contain asbestos fibers (presumed). Only to be removed/ repaired after inspection by professionals.	Sash cords in all areas of the building. Incorporate ACM into management plan until removal. Advice to staff/contractors
		Access to some external areas not available (hallway cupboards and balconies) so they presume may contain asbestos (others that were inspected did not)	Advice to staff/contractors
Sonning House	1890/2004	Sash cords	See above
		1) Presumptive: Cement flue to the right of the hatch 2) Presumptive: Cement shuttering around the flue pipe	Annual review items This material should be incorporated into the asbestos management plan until it has been removed prior to either demolition or refurbishment

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

		LZ001845: Paper lining to redundant strawboard (1m sq)	Remove as soon as is practicable Removed during compartmentation works
Property	Construction/ refurbishment year	Identified issues	Comments
Sonning House (cont.)	1890/2004	Access to some external areas not available (hallway cupboards and balconies) so they presume may contain asbestos (others that were inspected did not)	Advice to staff/contractors
Club Row / Old Nichol Street		3) Presumptive: roof tiles may contain Chrysotile	Annual review items • Annual inspection required to identify any deterioration • Ensure no access for residents to loft space • Ensure staff/ contractors made aware
Drapers	1890-1910/2000/2016		
	2007 survey	No action	Fireplaces not to be disturbed.
	2016 survey	Presumed Chrysotile roof	Action Items Remove roof to disused toilet block
		Presumed fibre in adhesive under parquet floor	Encapsulated. Not to be disturbed.
458 BGR	2019 survey	Insulation residue in boiler room: see below.	All works completed 2019

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

PROPERTIES WITH ASBESTOS SURVEY AND NO FURTHER ACTION

Property	Construction/ Refurbishment year	Identified issues	comments
Crimscott Street / Lena Fox House (front building)	1904/2014	Very low risk floor tiles and bitumen	Pre-refurbishment survey-addressed during the works as that area was demolished by landlords St Mungo's
Heather Lodge	2002	No asbestos identified	One area to be investigated further = electrical substation (which PRHA cannot access).
EGH	1800/2016	No asbestos identified	
DGH	1990/2014	No asbestos identified	
Providence Row Close	c.1900	No asbestos identified	2020 survey

Letter on file from supervising surveyor

Property	Construction/ Refurbishment year	Identified issues	Comments
226-8 Cambridge Heath Road	1800/2016		Works simultaneous with EGH (no asbestos identified)
			Letter on file from supervising surveyor - no further action
Buxton Street	1997	No report on file/check Brick Lane in archives	Letter on file from supervising surveyor - no further action

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35

Maintenance & Asset Management	Asbestos Policy and Management Plan
Providence Row Housing Association	VERSION: 5

PROPERTIES NOT REQUIRING AN ASBESTOS SURVEY as constructed 1999 and after (do not include refurbishments)

Property	Construction year
Crimscott Street annexe	2014
Rivaz Place	2000
Fidelis House	2010
Aylward Street (Amber + Rose + Jade + Senrab)	2010
Providence House	2009
3 Three Colt Street	2009
Acorn House	2002
Levanter House Freeholder Clarion	2012

Effective Date: 21 st August 2025	Review Date: 10 th March 2026
Approved by PRHA Board SLT: 2 nd April 2026	File No: MP35