



# Brent

## **Asbestos Policy**

Version 1.0 – March 2026

Owner: Director Housing Services

## Asbestos Policy

### Version Control Table

<b>Version Number</b>	<b>Date</b>	<b>Purpose/Change</b>	<b>Reviewer/Authoriser</b>
1.0	March 2026	Original Policy	Gary Mitchell

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## 1. Purpose

The purpose of this Policy is to set out Brent Council's commitment to the safe management of asbestos-containing materials (ACMs) across all residential and operational premises. It establishes the framework for compliance with the Control of Asbestos Regulations 2012 (CAR 2012) and related legislation, ensuring that ACMs are identified, assessed, recorded, and managed safely throughout the lifecycle of each building.

This Policy supports Brent Council's wider Building Safety Strategy and fulfils statutory duties under the Health and Safety at Work etc. Act 1974 and the Building Safety Act 2022, protecting residents, employees, contractors, and visitors from the risks associated with asbestos exposure.

## 2. Scope

This policy applies to:

- All residential buildings owned or managed by Brent Council. Including general needs housing, supported and sheltered schemes, temporary accommodation, and houses in multiple occupation (HMOs).
- All communal areas, boiler rooms, and plant spaces under Brent Council's Housing and Property Services.
- Any operational or commercial premises managed by Brent Council where ACMs may be present.
- All Brent Council staff, contractors, consultants, and partner organisations involved in housing management, maintenance, or compliance services that could affect building safety.

Leasehold-only dwellings are outside the direct legal duty under CAR 2012; however, Brent Council will provide advice and cooperate with leaseholders where ACMs could affect shared parts of a building.

Non-Housing corporate premises are covered under the Council's Corporate Health and Safety Policy.

## 3. Policy Statement

Brent Council recognises that asbestos, when disturbed or damaged, presents a serious risk to health and remains a significant legacy issue within social-housing stock. The Council will therefore take all reasonably practicable measures to prevent exposure to asbestos fibres and to comply fully with all statutory requirements.

Brent Council's policy is to:

- **Identify and Assess** all ACMs within its property portfolio through systematic surveys undertaken by competent persons.
- **Maintain an Asbestos Register** and ensure this information is accurate, accessible, and updated following any survey, inspection, or remedial work.
- **Manage Risk Proportionately**, ensuring ACMs in good condition remain undisturbed and are subject to regular inspection, while damaged or high-risk materials are safely remediated or removed.
- **Ensure Competence** by engaging only UKAS-accredited consultants and HSE-licensed asbestos contractors. All asbestos-related work will be carried out only by competent persons holding UKATA or BOHS accreditation, and, where required, by HSE-licensed contractors.
- **Inform and Protect Residents**, staff, and contractors by providing clear information about asbestos risks and control measures.
- **Maintain Robust Governance**, performance monitoring, and assurance processes to verify ongoing compliance.
- **Promote Transparency and Learning**, sharing lessons from audits, incidents, and regulatory updates to drive continuous improvement.
- **Share Information** by providing access to asbestos register information. This will be controlled and provided on a need-to-know basis to protect residents, staff, and contractors, while ensuring that anyone who may disturb ACMs has the information necessary to work safely.

This policy reflects Brent Council's commitment to a proactive, risk-based, and transparent approach to Building Safety management across all its housing assets, in order to protect the health and wellbeing of residents and others.

### 4. Legal and Regulatory Framework

Brent Council will comply with, and remain informed of, all relevant legislation, Approved Codes of Practice (ACoPs), and guidance, including but not limited to:

- Control of Asbestos Regulations 2012 (CAR 2012)
- Health and Safety at Work etc. Act 1974
- Management of Health and Safety at Work Regulations 1999
- Construction (Design and Management) Regulations 2015 (CDM 2015)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Building Safety Act 2022
- Housing Act 2004 – Housing Health and Safety Rating System (HHSRS)

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- HSG227 A Comprehensive Guide to Managing Asbestos in Premises
- HSE Approved Code of Practice L143: Managing and Working with Asbestos
- Control of Substances Hazardous to Health Regulations 2002 (COSHH)
- Environmental Protection Act 1990 (Duty of Care)
- Hazardous Waste (England and Wales) Regulations 2005.

Compliance with these standards ensures the Council fulfils its duties as employer, landlord, and person in control of premises.

## 5. Strategic Principles

Brent Council's approach to implementing this policy is guided by the following principles:

### 5.1 Lifecycle Asbestos Management

- Brent Council will use a formal material and priority risk scoring system based on HSG264 to inform reinspection frequency and remedial actions.
- Asbestos management will be embedded at every stage of a building's lifecycle – design, construction, occupation, refurbishment, and end-of-life.
- Designers and project managers must consider asbestos information at concept and pre-construction stages, referencing the Asbestos Register to prevent disturbance of known materials.
- Demolition or major refurbishment will only proceed following an intrusive refurbishment and demolition survey and the safe removal of identified ACMs.

### 5.2 Risk-Based and Proportionate Control

- Controls and resources will be prioritised based on property risk profiles, occupancy type, and building age.

### 5.3 Governance and Accountability

- Clear lines of accountability are fundamental. Duty holders and Responsible Persons are formally designated to ensure strategic oversight and operational delivery.
- The Council's Housing Compliance Board will review performance and escalate issues to the Chief Executive and Cabinet where necessary.

#### **5.4 Competence and Training**

- Only competent, trained personnel and licensed contractors shall undertake asbestos work. Staff whose duties may bring them into contact with ACMs will receive asbestos-awareness training; managers and compliance officers will undertake additional training in risk assessment, contractor control, and legal duties.

#### **5.5 Resident Engagement and Inclusion**

- Residents and leaseholders will be kept informed about asbestos within their homes and communal areas.
- Residents will receive asbestos awareness information at tenancy sign-up and prior to or following any asbestos survey or remedial work in their home.
- We will seek to engage residents through communications and, where appropriate, consultation on major works.
- Particular consideration will be given to residents who may be at higher risk to ensure suitable additional measures or adjustments are in place.

#### **5.6 Monitoring, Audit and Continuous Improvement**

- Asbestos safety performance will be reviewed and verified through regular inspections, internal and external audits, and data analysis.
- Brent Council is committed to learning from any Building Safety incidents, audit findings, or near-misses, as well as updates in legislation or best practice, in order to continually improve our safety management systems and procedures.

#### **5.7 Open Safety Culture**

- Brent Council will promote a just and open culture where employees, contractors, and residents can report Asbestos Safety concerns without fear of reprisal. All reports will be investigated, acted upon, and used to strengthen system-wide learning.

### **6. Governance and Accountability**

Brent Council operates a clear governance framework that defines strategic accountability and operational responsibility for Asbestos Safety across all housing assets. The structure ensures effective oversight, competent delivery, and continuous improvement.

## 6.1 Duty Holder

The Chief Executive is the Council's Duty Holder for health and safety and retains ultimate accountability for Asbestos Safety compliance. They ensure that appropriate arrangements, competent personnel, and sufficient financial and organisational resources are in place to manage the risks of asbestos across all Brent Council housing stock.

This accountability is supported through the Council's governance framework, including the Brent Housing Committee Board, internal audit, and reports to the Cabinet and Audit & Assurance Committee.

## 6.2 Asbestos Management and Assurance

<b>Strategic Responsible Person</b>	Name	Spencer Randolph
	Position	Director Housing Services
	Email	spencer.randolph@brent.gov.uk
	Responsibilities	Holds strategic accountability for asbestos compliance; approves Policy and Management Plan; secures resources; ensures asbestos management is integrated into the wider Building Safety Strategy; reports to the Chief Executive and governance boards.
<b>Deputy Strategic Responsible Person</b>	Name	Gary Mitchell
	Position	Head of Service Housing Management Property
	Email	gary.mitchell@brent.gov.uk
	Responsibilities	Supports and deputises for the Strategic Responsible Person. Coordinates the delivery of the Asbestos Safety strategy across departments, ensuring collaboration between housing, asset management, and compliance teams. Monitors performance data, escalates significant risks, and ensures that Asbestos Safety is given appropriate priority within service planning.
<b>Local Responsible Person</b>	Name	Jai Patrick
	Position	Strategic Compliance Manager
	Email	jai.patrick@brent.gov.uk
	Responsibilities	Leads operational implementation, maintains the asbestos register, oversees surveys, re-inspection, and remedial programmes, ensures contractor competence, and acts as the main contact for regulators and auditors.

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<b>Compliance Lead (Contract Manager)</b>	Name	Jim Fyfe
	Position	Contract and Compliance Manager Fire and Asbestos
	Email	Jim.fyfe@brent.gov.uk
	Responsibilities	Manages asbestos compliance contracts. Verifies survey quality and remedial works. Tracks KPIs and SLAs. Provides technical advice on standards and best practices.

### 6.3 Employees

All employees must cooperate with asbestos management arrangements, follow safe systems of work, complete training, and report suspected ACM damage or disturbance immediately.

### 6.4 Residents and Leaseholders

Residents and leaseholders must cooperate with asbestos management procedures, allow access for inspections or remedial works, and refrain from disturbing materials identified as containing or suspected to contain asbestos. Where access is not provided, Brent Council will escalate the matter promptly and may take enforcement or legal action to ensure statutory safety duties are met.

### 6.5 Contractors

All contractors must hold current UKAS or HSE licences appropriate to their scope of work, comply with Brent Council's Asbestos Procedures, and provide risk assessments and method statements before commencing work. Poor performance or non-compliance may result in suspension or removal from the approved supplier list.

## 7. Monitoring and Assurance

Compliance with this Policy will be monitored and verified through both ongoing performance tracking and periodic reviews. These reports enable senior management to review safety performance and address any areas of concern.

- Key performance indicators (KPIs) will be reported monthly to the Brent Housing Committee Board.
- Audits will be conducted to provide assurance that the Council's Policies and Management Plans remain effective and compliant with current legislation and best practice.
- The Asbestos Management Plan outlines in detail how compliance will be achieved and evidenced, including the use of our chosen compliance monitoring system (True

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Compliance). We will utilise such systems to maintain accurate records and produce management reports.

- A formal review of this policy will take place every 12 months, or sooner if legislation or best practice changes.

### 8. Equality, Diversity and Inclusion

Brent Council will ensure that Asbestos Safety measures consider the diverse needs of residents and staff, including those with disabilities, language barriers or additional vulnerabilities, in line with the Equality Act 2010.

### 9. Communication

This policy will be published on Brent Council's website and made available to all relevant stakeholders, including residents, staff, and contractors. Brent Council will communicate with residents about safety in their buildings through appropriate channels.

Residents dissatisfied may escalate concerns in line with the Brent Council Complaints Policy.

### 10. Related Documents

- Asbestos Management Plan
- Resident Engagement Strategy
- Gas Safety Policy
- Electrical Safety Policy
- M&E Services Policy
- Fire Policy
- Water Safety Policy
- Health & Safety Policy
- Complaints Policy
- Damp & Mould Policy
- Repairs and Maintenance Policy
- No Access Policy

**Approved by: Director of Housing Services**

**Next Review: March 2027**

**Version: 1.0**

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