



# **Health & Safety Asbestos Management Plan**

# Asbestos Management Plan Rv2.0

Effective from: March 2025

|                                |                  |                         |               |
|--------------------------------|------------------|-------------------------|---------------|
| <b>Nexgen Contract ID:</b>     | 127445           | <b>NexGen Job ID:</b>   | 663620        |
| <b>Version:</b>                | 2.0              | <b>Completion Date:</b> | 04 March 2025 |
| <b>Report Author:</b>          | Richard Marshall |                         |               |
| <b>Report Issue Date:</b>      | 24 March 2025    |                         |               |
| <b>Recommended review date</b> | March 2026       |                         |               |

## Document Control

| Date       | Version    | Comments                                                                                                                                                                                                                                                                                                                                                          |
|------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 05/10/2023 | DRAFT      | Draft issue to Client for comment                                                                                                                                                                                                                                                                                                                                 |
| 09/02/2024 | V.10       | Final version - for issue to client                                                                                                                                                                                                                                                                                                                               |
| 7/02/2025  | DRAFT V2.0 | Draft V2.0 for comment                                                                                                                                                                                                                                                                                                                                            |
| 24/03/2025 | 2.0        | Final version issued to client                                                                                                                                                                                                                                                                                                                                    |
| 10/03/2026 | 2.1        | <b>1<sup>st</sup> Annual review:</b> Updated P&P org chart; amendment to job title of Head of Property Management to Head of Property throughout; removed reference to the Planned & Cyclical Programme Manager; added links from contents to sections; corrected short term action plan dates (error of 2023; amended to 2025) and minor grammatical amendments. |
|            |            |                                                                                                                                                                                                                                                                                                                                                                   |

## Important Information about your Asbestos Management Plan

**This Asbestos Management Plan is a document with legal status - IT SHOULD BE MADE AVAILABLE AT ALL TIMES**  
If you need help understanding the requirements of this document contact the Responsible Person/Head of Property

[Important Information about your Asbestos Management Plan](#)

[1.0 - Introduction to the Management of Asbestos](#)

[2.0 - Asbestos management legislation](#)

[3.0 - Roles and Responsibilities for Asbestos Management](#)

[4.0 - Action Plan](#)

[5.0 - Asbestos Records](#)

[6.0 - Dissemination of Management Plan Information to Internal Maintenance](#)

[7.0 - Ongoing Assessment of Asbestos](#)

[8.0 - Training and Induction](#)

[9.0 - Safe Systems of Work](#)

Asbestos Removal Works

Unplanned Incidents

[10.0 – Monitoring and Review of the Asbestos Management Plan](#)

[11.0 - Asbestos Incident / Emergency Procedure](#)

[12.0 - References](#)

[Appendix 1 – Survey Type Specification](#)

[Appendix 2. Assessment Algorithms](#)

[Appendix 3 – Glossary of Terms](#)

[Appendix 4 – Emergency Procedure Support Information](#)

[Appendix 5 – Asbestos Management Regulations](#)

[Appendix 6 – List of Duty Holders Properties](#)

## 1.0 - Introduction to the Management of Asbestos

### Introduction

Regulation 4 of the Control of Asbestos Regulations 2012 requires that reasonable steps are put in place to manage the risk posed by the presence of asbestos containing materials in non-domestic premises. Those responsible for managing these risks are termed "Duty Holders".

The broad requirements for duty holders are:

- Take reasonable steps to determine the location of materials likely to contain asbestos
- Presume materials to contain asbestos, unless there are good reasons not to do so
- Make and maintain a written record of the location of the asbestos and presumed asbestos materials
- Monitor the condition of asbestos and presumed asbestos materials
- Assess the risk of exposure from the asbestos and presumed asbestos materials and document the actions necessary to manage the risk
- Take steps to see that the actions above are carried out.

To manage the risk of asbestos-containing materials there is a requirement to:

- Keep and maintain an up-to-date record of the location, condition, maintenance and removal of all asbestos-containing material on the premises
- Repair, seal or remove, if there is a risk of exposure due to its condition or location
- Maintain it in a good state of repair and regularly monitor the condition
- Inform anyone who is likely to disturb it about the location and condition of the material
- Have arrangements and procedures in place, so that work which may disturb the material complies with CAR 2012
- Review the plan at regular intervals and make changes to the plan and arrangements if circumstances change.

This document outlines the steps needed to ensure compliance with these requirements whilst occupying and/or working throughout properties where YMCA SPG is the duty holder.

### Scope of Asbestos Management Plan

YMCA SPG recognises its duties under the Health and Safety at Work Act 1974, the Control of Asbestos Regulations 2012 and all associated Approved Codes of Practices and is committed to the effective management of asbestos.

YMCA SPG recognises its responsibilities to contractors and others involved in building and maintenance projects established through the Construction (Design and Management) Regulations 2015 and its duties as Duty Holder to ensure that asbestos is managed as defined by Regulation 4 of the Control of Asbestos Regulations 2012.

This Asbestos Management Plan sets out YMCA SPG's strategy for compliance with all relevant Health and Safety legislation regarding asbestos for all properties under its control. This document details what steps will be undertaken by YMCA SPG and the Responsible Person to ensure that the risk from known or suspected Asbestos Containing Materials (ACMs) identified is adequately managed, so that as far as reasonably practicable no one can come to any harm from asbestos.

It also details the responsibilities of YMCA SPG and its employees, contractors and regular building users. All procedures outlined within are mandatory for all parties involved. This document and the procedures outlined require the cooperation of all employees, all staff, building users and contractors who also have responsibilities to ensure a safe and healthy working environment is always maintained.

## 2.0 - Asbestos management legislation

There are many health and safety regulations that directly or indirectly place duties on employers in relation to asbestos. These are outlined in relation to the management of asbestos across all sites for which YMCA SPG and all other key stakeholders have responsibility:

**The Health & Safety at Work etc. Act 1974 (HSW):** requires employers to conduct their work in such a way that their employees will not be exposed to health and safety risks, and to provide information to other people about their workplace which might affect their health and safety. Section 3 of the HSW Act contains general duties on employers and the self-employed in respect of people other than their own employees. Section 4 contains general duties for anyone who has control, to any extent, over the workplace.

**The Management of Health & Safety at Work Regulations 1999:** (the Management Regulations) requires employers and self-employed people to assess the risks to the health and safety of themselves, employees and people not in their employment, arising out of or in connection with the conduct of their business – and to make appropriate arrangements for protecting those people's health and safety. Any assessment made for the purposes of the Asbestos Regulations will not need to be repeated for the Management Regulations.

**The Workplace (Health, Safety and Welfare) Regulations 1992:** require employers to maintain workplace buildings to protect occupants and workers.

**The Construction (Design & Management) Regulations 2015:** require the client to pass on information about the state or condition of any premises (including the presence of hazardous materials such as asbestos) to the Principal Designer before any work begins and to ensure that the health and safety file is available for inspection by any person who needs the information.

**The Control of Asbestos Regulations (CAR) 2012:** requires employers to prevent the exposure of their employees to asbestos, or where this is not practicable, to reduce the exposure to the lowest possible level.

Regulation 4 specifically requires duty holders to:

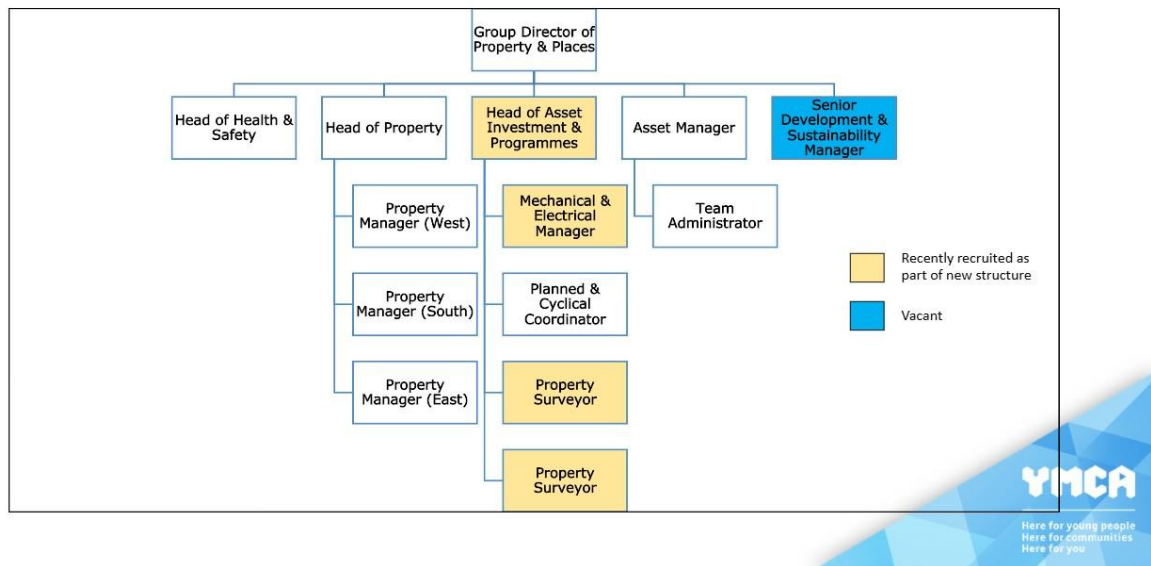
- a) Take reasonable steps to find materials in premises likely to contain asbestos and to check their condition
- b) Presume that materials contain asbestos unless there is strong evidence to suppose that they do not
- c) Make a written record of the location and condition of asbestos and presumed asbestos-containing materials (ACMs) and keep the records up to date
- d) Assess the risk of the likelihood of anyone being exposed to these materials; and
- e) Prepare a plan to manage that risk and put it into effect to ensure that:
  - i. Any material known or presumed to contain asbestos is kept in a good state of repair
  - ii. Any material that contains or is presumed to contain asbestos is, because of the risks associated with its location or condition, repaired or if necessary, removed; and
  - iii. Information on the location and condition of the material is given to anyone potentially at risk.

### 3.0 - Roles and Responsibilities for Asbestos Management

This section will outline the roles and responsibilities of all those concerned with the management of asbestos within properties where YMCA SPG is the duty holder. It is recommended that you familiarise yourself with the hierarchy of responsibility that follows to allow rapid and accurate communication in the event of an asbestos incident.

#### Asbestos Management Organogram at March 2026

#### P+P High Level Service Structure....



The roles and responsibilities detailed below should be read in conjunction with YMCA SPG organogram for asbestos management.

#### Duty holder and responsible person

Regulation 4 (CAR 2012) - 'the duty to manage' covers all non-domestic premises.

The duty holder is defined by Regulation 4 of CAR 2012: 'every person who has, by virtue of a contract or tenancy, an obligation of any extent in relation to the maintenance or repair of non-domestic premises or any means of access/egress to or from those premises.

To make sure that asbestos containing materials (ACMs) are properly managed, a named person (or named persons) will be identified and appointed within YMCA SPG who will be responsible for that management. This person has been identified as the Responsible Person for all properties where YMCA SPG is the duty holder. The responsible person will need the resources, skills, training, authority etc. to ensure the job can be done.

The duty holder's legal responsibilities cannot be delegated, but duty holders can nominate others to do all or part of the work to assist in complying with the duties. Anyone or any organisation who is nominated to do some work must know what it is they must do and be able to do it safely. They should be competent to do this work.

## Overview of roles and responsibilities

Where duties have been outlined, this should be used as an initial guide for discussion/definition of roles. All responsibilities can be delegated, unless otherwise stated, but it should remain the responsibility of the designated person to ensure they are completed satisfactorily.

| <b>Role: Duty Holder – Group Director of Property &amp; Place</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Roles and responsibilities:</b></p> <ol style="list-style-type: none"><li>1. Overall responsibility for ensuring that all regulations and legislation relevant to asbestos are implemented and that appropriate management systems are in place to minimise the risk of exposure to asbestos, of its staff, visitors and any persons engaged to carry out work on its behalf.</li><li>2. Ensure adequate resources are made available to enable the Responsible Person to fully comply with all Asbestos Regulations and Guidance.</li></ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Role: Responsible Person - Head of Property</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <p><b>Training requirements:</b> Asbestos awareness training, Duty to Manage Asbestos training</p> <p><b>Ongoing training requirements:</b> Asbestos awareness refresher training</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>Roles and responsibilities:</b></p> <ol style="list-style-type: none"><li>1. Undertake appropriate level of asbestos training and understand the limitations of a management survey report</li><li>2. Act as the asbestos lead and oversee asbestos management provision across properties where YMCA SPG is the duty holder</li><li>3. Review agreed roles and nominate, as appropriate</li><li>4. Inform all relevant parties of the asbestos management provision and their responsibilities.</li><li>5. Undertake a training needs analysis to ensure adequate instruction and training is provided to enable persons to fulfil their responsibilities with regards to asbestos management and ensure periodic refresher training is arranged when required.</li><li>6. Ensure that Property Managers (and any other relevant roles) can interpret the asbestos records held, how to interrogate and understand the information held within them.</li><li>7. Oversee the implementation of all procedures and safe systems of work regarding asbestos throughout properties where YMCA SPG is the duty holder.</li><li>8. Ensure a management survey is conducted for all properties where YMCA-SPG is the duty holder and annual reinspection surveys are conducted where ACM has been identified/assumed.</li><li>9. Ensure a Refurbishment &amp; Demolition survey is undertaken ahead of directly managed refurbishment and demolition work (where applicable). All survey works are to be undertaken by organisations who have organisational UKAS accreditation to ISO/IEC 17020.</li><li>10. Ensure that the findings of the latest asbestos surveys and/or inspection reports are reviewed and if necessary, arrange for remedial works as recommended.</li><li>11. Ensure that the Head of Health and Safety is made aware of any planned work involving asbestos.</li><li>12. Arrange for asbestos remediation works when required in line with the asbestos removal procedure documented in this Asbestos Management Plan. All air testing works to be undertaken by organisations with organisational UKAS accreditation to ISO/IEC 17025.</li><li>13. Ensure an assessment of planned works is made against the asbestos information available prior to commencing works.</li><li>14. Ensure contractor compliance with asbestos management plan requirements</li><li>15. Ensure works are undertaken with due care and attention following asbestos safe working practices.</li><li>16. Keep staff and managers informed about asbestos hazards and control measures that are relevant to their work, department and staff</li><li>17. Ensure all records are maintained and updated in accordance with the regulatory requirements and codes of practice for asbestos work.</li><li>18. Report any incidents of asbestos exposures to the Head of Health &amp; Safety.</li><li>19. Implement and ensure the Asbestos Management Plan is reviewed every 12 months as a minimum.</li><li>20. Act as the main point of contact for all questions and queries relating to asbestos.</li></ol> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Role: Property Managers</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Training requirements:</b> Asbestos awareness training; Duty to Manage Asbestos<br><b>Ongoing training requirements:</b> Asbestos awareness refresher training                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Roles and responsibilities:</b> <ol style="list-style-type: none"> <li>1. Undertake appropriate level of asbestos awareness training.</li> <li>2. Fully cooperate with the responsible person to maintain compliance with asbestos legislation and achieve the goal of effective asbestos management.</li> <li>3. Act as the main point of contact for any third party contracted works commissioned and ensure that they are provided with all relevant asbestos information for their area of responsibility.</li> <li>4. Prior to commissioning works, ensure that a suitable and sufficient assessment has been undertaken. If not, liaise with the Responsible Person.</li> <li>5. Responsibility for ensuring that all relevant asbestos information is provided to all third-party contractors prior to commencement and an assessment of the task is made against the records held.</li> <li>6. Inform the Responsible Person of any changes to ACM condition discovered.</li> <li>7. Ensure satisfaction with asbestos records held, be able to interrogate and understand the information held within them. If unsure or have any queries, then these must be raised with the Responsible Person.</li> <li>8. Direct any questions or queries regarding asbestos to the Responsible Person.</li> </ol> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Role: Maintenance Operatives</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Training requirements:</b> Asbestos awareness training<br><b>Ongoing training requirements:</b> Asbestos awareness refresher training                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Roles and responsibilities:</b> <ol style="list-style-type: none"> <li>1. Undertake appropriate level of asbestos awareness training.</li> <li>2. Fully comply with the Responsible Person to maintain compliance with asbestos legislation and achieve the goal of effective asbestos management.</li> <li>3. To consult the asbestos information before starting work in any area</li> <li>4. Ensure works are undertaken with due care and attention following asbestos safe working practices.</li> <li>5. Ensure an assessment of planned works is made against the asbestos information available prior to commencing works. Should information appear insufficient or inaccurate, these should be raised with the Property Manager before undertaking work.</li> <li>6. Ensure that they understand how to interrogate the asbestos records held and understand the information held within them.</li> <li>7. Ensure an understanding of asbestos safe working procedures within YMCA SPG and operate within these procedures.</li> <li>8. Stop works IMMEDIATELY and inform the Property Manager if they find any previously unidentified asbestos, damaged asbestos or if they know that the condition of any ACM has changed in any way.</li> <li>9. Direct any questions or queries regarding asbestos to the Property Manager.</li> </ol> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Role: Planned &amp; Cyclical Programme Coordinator</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Training requirements:</b> Asbestos awareness training.<br><b>Ongoing training requirements:</b> Asbestos awareness refresher training                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Roles and responsibilities:</b> <ol style="list-style-type: none"> <li>1. Undertake an appropriate level of asbestos awareness training.</li> <li>2. Ensure an Asbestos Management Survey is arranged and conducted for all properties in YMCA St Paul's Group portfolio, built prior to 2000.</li> <li>3. Ensure Asbestos Management Survey Reports are uploaded to the property database and available within the relevant property folders on SharePoint.</li> <li>4. Plan the annual programme of asbestos inspections between January – March of each year and liaise with the asbestos contractor for the following financial year – ensuring the inspections are conducted within one calendar year of the previous inspection.</li> <li>5. Review of each asbestos survey and/or inspection report for areas not accessed and/or recommendations included</li> <li>6. Update the register of areas not inspected within the compliance matrix.</li> <li>7. Upload any recommendations to the property database with due dates in line with the asbestos contractors' recommendations.</li> <li>8. Direct any questions or queries regarding asbestos reports to the Responsible Person and/or the Head of Health &amp; Safety.</li> </ol> |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Role: External Contractors</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Training requirements:</b> Asbestos awareness<br><b>Ongoing training requirements:</b> Refresher training                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Roles and responsibilities:</b> <ol style="list-style-type: none"> <li>1. Provide the Responsible Person or those commissioning their services with verification that all operatives have undertaken asbestos awareness training.</li> <li>2. Fully comply with YMCA SPG to maintain compliance with asbestos legislation and achieve the goal of effective asbestos management.</li> <li>3. Ensure works are undertaken with due care and attention following asbestos safe working practices.</li> <li>4. Ensure an assessment of planned works is made against the asbestos information available prior to commencing works. Should information appear insufficient or inaccurate queries should be raised with the Responsible Person or those commissioning their services before undertaking work.</li> <li>5. Ensure all operatives understand how to interrogate the asbestos records held and understand the information held within them.</li> <li>6. Ensure all operatives understand the asbestos safe working procedures for the site and operate within these procedures.</li> <li>7. Stop works IMMEDIATELY and inform the person commissioning the works if they find any previously unidentified asbestos, damaged asbestos or if they know that the condition of any ACM has changed in any way.</li> <li>8. Direct any questions or queries regarding asbestos to the Property Manager/Head of Health and Safety.</li> </ol> |

## 4.0 - Action Plan

This section details what steps should be undertaken to achieve the goal of effective asbestos management. The detail given here is further to the comments and recommendations given within the Asbestos Registers held.

### Short Term Actions

Actions which should be undertaken in the next three months:

| Action                                                                                                          | Timescale    | Responsibility     | Status                                                                                                               |
|-----------------------------------------------------------------------------------------------------------------|--------------|--------------------|----------------------------------------------------------------------------------------------------------------------|
| 1. Appoint a person responsible for asbestos management                                                         | October 2025 | YMCA SPG           | Complete                                                                                                             |
| 2. Prepare an Asbestos Management Plan                                                                          | October 2025 | Lucion Services    | Complete                                                                                                             |
| 4. Inform all parties of their responsibilities with regards to asbestos management                             | October 2025 | Responsible Person | Complete                                                                                                             |
| 5. Undertake a training needs analysis and devise training strategy (including refresher training requirements) | 2025         | Responsible Person | Complete                                                                                                             |
| 6. Coordinate appropriate asbestos training                                                                     | 2025         | Responsible Person | Complete                                                                                                             |
| 7. Ensure areas of 'no-access' are inspected to confirm whether ACM is present or not.                          | 2025-26      | Responsible Person | Complete<br>Register of areas not inspected due to height or access restrictions maintained within compliance matrix |

### Medium Term Actions

Actions which should be undertaken in the next three to six months:

| Action | Timescale | Responsibility | Status |
|--------|-----------|----------------|--------|
| N/A    |           |                |        |

### Long Term Actions

Actions which should be undertaken in the next 12 months:

| Action | Timescale | Responsibility | Status |
|--------|-----------|----------------|--------|
| N/A    |           |                |        |

## On-going Actions

Actions which should be undertaken on an ongoing basis:

| Action                                                                                                                                                                                | Timescale                                     | Responsibility                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|------------------------------------------------------|
| 1. Review and update of the Asbestos Management Plan                                                                                                                                  | Annual                                        | Head of Health and Safety in conjunction with Lucion |
| 2. Asbestos Management Surveys for newly acquired properties                                                                                                                          | Upon acquisition                              | Planned & Cyclical Programme Coordinator             |
| 3. Annual reinspection surveys - to include priority risk assessments – for properties with confirmed or assumed asbestos containing materials                                        | Annual                                        | Planned & Cyclical Programme Coordinator             |
| 4. Record any remedial work if identified following annual reinspection survey                                                                                                        | Following reinspection survey / as identified | Planned & Cyclical Programme Coordinator             |
| 5. Arrange for any remedial work identified following annual reinspection survey to be completed                                                                                      | Following reinspection survey / as identified | Property Managers                                    |
| 4. Ensure Refurbishment & Demolition surveys (where applicable) are conducted ahead of planned refurbishment works                                                                    | Ahead of planned works                        | Head of Property/ Property Managers                  |
| 5. Update of asbestos records following any survey and / or remediation works                                                                                                         | Upon completion of works                      | Planned & Cyclical Programme Coordinator             |
| 6. Ensure all personnel whose work may bring them into contact with any known or suspected ACMs are informed prior to the works starting,                                             | Ongoing                                       | Property Managers                                    |
| 7. Ensure suitable assessments are undertaken before any works which may disturb known or suspected ACMs or any areas that have been recorded as Limited or No access on the surveys. | Ongoing                                       | Head of Property, Property Managers                  |
| 8. Refresher training as appropriate to roles                                                                                                                                         | Ongoing                                       | Responsible Person                                   |

## 5.0 - Asbestos Records

The following sections summarises what information is held. All documentation is available as an electronic copy onsite and is briefed to contractors across all sites as part of a contractor's induction.

### **Asbestos Management Plan:**

The Control of Asbestos Regulations 2012 requires all duty holders as part of their on-going asbestos management to have a written Asbestos Management Plan (AMP). This document is the AMP for YMCA-SPG and details what steps will be taken to effectively manage all items of asbestos; it is specifically written for properties where YMCA SPG is the duty holder and cannot be transferred. It also provides a link to the Asbestos Portal where the current survey/re-inspections can be found. and provides recommendations, priorities and deadlines for action.

The Asbestos Management Plan is available for reference and use to all those who plan, supervise or carry out maintenance work or special projects, [via the health and safety intranet pages](#)

### **Asbestos Management Organogram:**

YMCA SPG currently have in place an internal asbestos management organogram. This identifies all key roles / departments who have some involvement in asbestos management throughout properties where YMCA SPG is the duty holder.

Furthermore, in order to support and aid the understanding of the responsibilities of the identified roles involved in asbestos management all roles are documented within Section 3 of the Asbestos Management Plan along with responsibilities so that all personnel know what is required of them.

It is important to note that the duty holder's legal responsibilities cannot be delegated, but duty holders can nominate others to do all or part of the work to assist in complying with the duties. Anyone or any organisation who is nominated to do some work because of this regulation must know what it is they have to do and be able to do it safely. They should be competent to do this work.

### **Asbestos Registers:**

Information regarding the location and condition of asbestos within properties where YMCA SPG is the duty holder can be found in the Asbestos surveys undertaken by YMCA SPG and subsequent inspections are available via the YMCA intranet (H&S/Property Compliance folders); Job Logic or via the Property Managers/Head of H&S). In addition, all staffed sites will be provided with a copy of the asbestos register which will be supplied to contractors prior to commencement of any work on the site. Contractors will be required to confirm they have read and understood the register prior to any works.

This Asbestos Management Plan should be read in conjunction with the relevant asbestos register.

### **Training Records:**

All those who plan and manage works which may affect or be affected by asbestos and other identified personnel will be given an appropriate level of training and help to understand their responsibilities and any information regarding asbestos. All training will be an ongoing process. The training will be refreshed and records updated accordingly on a three yearly basis and records stored on the Learning Hub or can be requested from the Learning and Development Team. These records will be kept in a controlled location (Learning Hub). Each employee will, however, have access to their own records upon request.

All training must cover the regulatory duties under CAR2012 and be suitable and sufficient for the tasks and roles that the individual is going to perform. YMCA SPG employees will have their training organised in conjunction with the Responsible Person. Contractors, subcontractors and third parties have a legal obligation to provide training to their workers and YMCA SPG may request proof at any time. Failure to provide evidence of adequate training will result in workers being removed from the site.

All Contractors, subcontractors or third parties conducting work in properties where asbestos may be present shall provide details of their accreditations and operative training records, and any other

pertinent information, to the Responsible Person or person commissioning their services.

### **Asbestos Remediation:**

All details of asbestos removal or remedial works undertaken will be held by YMCA SPG. The Responsible Person has overall responsibility for ensuring they are conducted in accordance with this AMP and ensuring that the asbestos records are updated upon completion on the Property Base.

The remedial works will usually be arranged by Property Manager supported by the Planned & Cyclical Programme Coordinator and the asbestos records will be updated by the Planned & Cyclical Programme Coordinator or Property Managers upon completion.

The information held for remedial projects should include where applicable:

#### **Licensed Work:**

- ASB5 Notice and Contractors Method Statement.
- Smoke test certificate for each enclosure before work commences.
- Leak tests and air tests.
- Visual checks of the integrity of each enclosure to ensure its seals remain intact and control measures remain adequate and operational.
- Records of the monitoring and inspection of waste removal.
- Copies of consignment notes.
- Four Stage Clearance certificates.
- Visually check the area upon dismantling of the enclosure.
- Clearance test certificate of the decontamination unit.
- Certificate for Reoccupation for each enclosure and area worked on.
- Statement of Cleanliness for non-licensable asbestos works.

#### **Non-Licensed Work:**

- Contractors Method Statement.
- Air test records.
- Records of the monitoring and inspection of waste removal.
- Copies of consignment notes.
- Visual check the area upon completion of the work.
- Statement of Cleanliness for non-licensable asbestos works.

### **Re-inspections:**

Regulation 4(9) of the Control of Asbestos Regulations 2012 states that:

'(9) The measures to be specified in the plan for managing the risk shall include adequate measures for –  
(a) monitoring the condition of any asbestos or any substance containing or suspected of containing asbestos....'

The Responsible Person is responsible for ensuring that asbestos re-inspections are undertaken and for ensuring that the asbestos records are readily available to all and updated.

Any ACMs identified or suspected within properties where YMCA SPG is the duty holder will be reinspected at least annually to check that it has not changed condition, deteriorated or been damaged in any way. Reinspection's will be undertaken as in accordance with the Approved Code of Practice, L143 second edition, Managing and working with asbestos. Reinspection's will include an inspection of areas sealed and labelled during the reinspection to ensure the seals and labels remain in place.

### **Approved Asbestos Contractors:**

Only approved contractors will be employed to undertake asbestos surveys, re-inspections, licensable and non-licensable asbestos works throughout properties where YMCA SPG is the duty holder. YMCA SPG will retain a list of approved contractors - Insurance certificates, licenses, Health & Safety policy and training records will be viewed for these contractors ahead of any work.

It is expected that all other contractors employed to undertake maintenance within properties where YMCA SPG is the duty holder which may disturb the fabric of the building or known or presumed asbestos containing materials (ACMs) have undertaken asbestos awareness training as in accordance with Regulation 10. YMCA SPG is not responsible for providing third party contractors commissioned to

undertake work on their behalf with asbestos awareness training, they will however provide them with all relevant asbestos information to the planned works before they attend site and before works commence.

#### **Records of Exposure / Incidents:**

Any accidental exposure whilst carrying out maintenance operations or project work must be notified to the Responsible Person and Head of Health and Safety as soon as possible and recorded on the internal incident/accident reporting database in line with YMCA internal procedures [incident/accident reporting database](#)

The Responsible Person will notify the Head of Governance and Head of Health and Safety to ensure that, if relevant, it is reported to the Health and Safety Executive in line with the RIDDOR Reporting Requirements.

These records will be stored to maintain a record of any exposure to asbestos that has occurred in any part of properties where YMCA SPG is the duty holder or to an employee. Contractors, including asbestos removal contractors will be expected to control any records of their own staff unless previously arranged.

The Responsible Person and Head of Health and Safety will review periodically, and any investigations needed shall be conducted to determine what went wrong and how the asbestos was disturbed. These investigations and central register will be used to inform the reinspection regimes and the suitability of this Asbestos Management Plan under which the work was being undertaken.

Whilst every step will be taken to ensure exposure to asbestos does not occur, it is vital that good record keeping is maintained. These records will be treated as confidential to each member of staff and be kept in a controlled location. Each employee will have access to their own records upon request.

#### **Updating Information**

It is imperative that all asbestos records are regularly updated with any new information that becomes available. Asbestos records will be updated covering the following:

| <b>Action</b>                                                                                                                              | <b>Timescale</b>                           | <b>Responsible Party</b>                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|----------------------------------------------------------------|
| Remedial / removal works                                                                                                                   | Upon completion of works                   | Property Managers and Planned & Cyclical Programme Coordinator |
| Reinspection's, bulk sampling, further survey works                                                                                        | Upon completion of works                   | Property Managers and Planned & Cyclical Programme Coordinator |
| Training / site inductions                                                                                                                 | Upon completion of works / site inductions | Property Managers                                              |
| Accidental disturbance of known or suspected ACMs                                                                                          | Upon accidental disturbance of asbestos    | Responsible Person / Head of Health and Safety                 |
| Any changes made to the contact details for the Responsible Person and/or emergency contacts                                               | If / when contact details are amended      | Responsible Person / Head of Health and Safety                 |
| Any changes to the organisation structure of properties where YMCA SPG is the duty holder or YMCA SPG which may affect asbestos management | If / when organisation changes are made    | Responsible Person / Head of Health and Safety                 |
| Any new procedures adopted                                                                                                                 | If / when new procedures are adopted       | Responsible Person / Head of Health and Safety                 |

## 6.0 - Dissemination of Management Plan Information to Internal Maintenance Operatives and Contractors

### **Prior to Project Works Commencing**

Any relevant risk assessments, method statements, statutory notices must be in place before work commences. The Property Managers and/or the Planned & Cyclical Programme Coordinator will make reasonable checks that the contractors are aware of these requirements and, to allow for contractors to be able to plan and prepare their site-specific method statement and risk assessments, will provide the relevant information with regards to asbestos, as outlined below.

### **Area of work has documented evidence of the presence of ACMs**

- Information will be passed on to the contractor regarding the type of asbestos, its location and current condition. This information can be supplied in the form of the management plan, reinspection survey, asbestos management survey or pre-demolition survey (including photos and plans) dependent upon the nature of works to be carried out.

### **Area of work had known ACM's present, but have been removed prior to the contractor's works going ahead**

- YMCA SPG will supply all relevant paperwork (air test certification, Certificates of Reoccupation) that have applied to the asbestos removal work within that area.
- If any ACMs remain in the area that were not part of the removal specification, these will be identified to the contractor in the form of an updated register or reinspection survey.

### **Area of work is known to have had an asbestos survey carried out, and no known ACMs are present**

- YMCA SPG will issue a survey report indicating that the area has been surveyed, and that no items of asbestos were found within the limits of the survey.

### **Area of work has no information on the presence of ACMs**

- YMCA SPG will inform the contractor that they do not know if ACMs are present. The contractor, along with the Property Manager will then assess the scope of work to ascertain the level of asbestos survey required. It will be contractually agreed who commissions the survey work and the information produced must be made available to both YMCA SPG and their nominated contractor so that the asbestos records can be updated upon completion.

### **Maintenance Operatives and Contractors**

- Maintenance Operatives and contractors working for YMCA SPG must consult the premise's asbestos register before proceeding with any works.
- They must have suitable training to allow them to undertake their work safely.
- They must progress all works diligently, and should any suspicious materials be encountered, operations should be immediately suspended with further assistance sought from the Responsible Person.

## 7.0 - Ongoing Assessment of Asbestos

### **On-going Assessment**

On-going assessment of known or suspected ACMs will take the form of periodic reinspection surveys as in accordance with the Control of Asbestos Regulations 2012. It is imperative that both known and presumed asbestos containing materials are effectively monitored and that all asbestos information is as up to date and accurate as possible.

Similarly, any management procedures, permit-to-work systems, etc., will be audited and regularly assessed to ensure that they are achieving the goal of effective asbestos management. If any procedures are proved to be inadequate or any accidental or unknown disturbance of asbestos materials has occurred, then the necessary action can be taken.

### **REINSPECTION:**

All items that have been positively identified will undergo regular, ongoing reinspection's at 12 monthly intervals (minimum) from the date of the last inspection/survey.

The purpose of undertaking the reinspection is to ensure that Material and Priority Assessments are still current. i.e. that the material has not deteriorated in any way and that the use of the building has not changed. Any change to either criterion will result in the overall Risk Assessment being invalid and therefore a new assessment will be required. This will in turn be recorded. Reinspections are a requirement of ACoP L143 second edition, Managing and working with asbestos.

Reinspections will be organised annually by the Planned & Cyclical Programme Coordinator, and the asbestos records will be updated upon completion of works.

### **MONITOR AND REVIEW:**

This Asbestos Management Plan will be regularly reviewed and revised annually to ensure that all information is correct and that the plan achieves its objectives. More information regarding how the Asbestos Management Plan will be monitored and reviewed is given in Section 10.

## 8.0 - Training and Induction

**Appropriate training and induction will be provided for all relevant employees, to ensure an understanding of the hazards and risks involved when working in or near an area where asbestos has been identified. Asbestos information will be provided to all contractors.**

Asbestos training provided to employees will incorporate general asbestos awareness that is not only site specific but will also incorporate general asbestos knowledge and advice.

Within properties where YMCA SPG is the duty holder it is envisaged that there are a number of main users who require regular training/induction and the opportunity for feedback.

1. **MAINTENANCE OPERATIVES & EXTERNAL CONTRACTORS:**

YMCA-SPG Maintenance Operatives will be provided with Asbestos Awareness training. External contractors whose work may affect or be affected by asbestos present will be provided with relevant asbestos information.

2. **THOSE WHO PLAN AND MANAGE WORKS:**

Anyone who is involved in planning or supervising works which may affect or be affected by ACMs will be provided with Asbestos Awareness and Duty to Manage Asbestos.

3. **RESPONSIBLE PERSON:**

To ensure that those responsible for managing asbestos have sufficient knowledge of Asbestos Awareness and Duty to Manage Asbestos training is required.

### **External Contractors**

[The Health and Safety Standard for Selecting and Managing Contractors](#) must be adhered to when selecting suitable external contractors. This will ensure appropriate health and safety, and competency checks have been conducted relevant to the type of work and prior to works being issued. This will include the need to receive evidence that the prospective consultant/contractor has provided suitable asbestos awareness training to those who are liable to disturb asbestos containing materials as part of their works.

As in accordance with Regulation 10 of CAR 2012 and its associated ACOP L143, second edition, Managing and working with asbestos, any employees whose work could foreseeably expose them to asbestos should have compulsory asbestos awareness training.

It is not the responsibility of YMCA SPG to provide this training to external contractors. However, YMCA SPG recognises its responsibilities to contractors and will ensure that adequate information, is provided to any contractors on its premises in the form of access to the asbestos information and a site induction and will make reasonable checks to ensure those commissioned to undertake works to the fabric of the building on their premises have provided the operatives with asbestos awareness training.

The information provided to contractors by YMCA SPG will cover:

1. A summary of the location of any known or suspected ACMs which may affect, or are local to, the planned works.
2. The types of activities which are prohibited, areas which are controlled access, etc.
3. What to do should they suspect ACMs have been accidentally disturbed along with a contact number.

In addition, it is important to emphasise that any damage to an asbestos containing material (ACM) – no matter how minor - **MUST** be reported to the person commissioning the works and/or the Responsible Person as soon as possible so that appropriate action can be taken.

It is the responsibility of those commissioning or managing third party contracted works to ensure that contractors receive a copy of the asbestos information and are advised of their responsibilities to ensure works are assessed against the asbestos records held and that should they have any queries then works should not be undertaken until further guidance has been sought from the Responsible Person or those commissioning the work.

Persons who have direct involvement in emergency procedures, such as the Fire Brigade, etc. will also be made aware of where the asbestos register is held. The Responsible Person will liaise with the emergency services with regards to any further information they require.

### **Those who plan and manage work**

Asbestos Awareness training would not provide sufficient information for those that are responsible for 'managing' asbestos to undertake their roles in accordance with Regulation 4 of CAR 2012. Therefore, it is recommended that the Responsible Person, Property Managers and any other persons who put people to work or manage works to the fabric of the building undertake the 'Duty to Manage Asbestos' training course. This training must cover:

1. the main legislative requirements, in particular Regulation 4, of the Control of Asbestos Regulations 2012
2. the properties of asbestos and its effects on health, including the increased risks for asbestos workers who smoke
3. the types, uses and likely occurrence of asbestos and ACMs in buildings and plant
4. the Asbestos Management Plan and associated procedures
5. the Asbestos Register: its accessibility, use and limitations
6. the limitations of a survey and certificates of reoccupation
7. how to avoid the risks from asbestos eg for building work, no employee should carry out work which disturbs the fabric of a building unless the employer has confirmed that ACMs are not present
8. the types of activities which are prohibited, areas which are controlled access, etc.
9. how to continue the everyday running of sites should any planned asbestos works take place
10. the general procedures to be followed in an emergency, e.g. an uncontrolled release of asbestos dust into the workplace

All training provided will be recorded on the individual's training record stored on the Learning Hub or may be requested from the Learning and Development team

### **Responsible Person:**

It is recommended that the Responsible Person for Asbestos should consider a level of training over and above 'Asbestos awareness' such as a UKATA (or equivalent approved) 'Duty to Manage' level qualification. The aim of this course is to provide a practical knowledge of asbestos legislation, duty holder responsibilities and a basic knowledge of asbestos removal procedures. The course covers the following topics:

1. Legislation
2. Management of Asbestos in Buildings
3. Asbestos Remediation
4. Role of Laboratory / Analysts
5. Practical Assessment

Until such a course is undertaken the Responsible Person will be supported by industry specialists who will provide suitable knowledge, experience and guidance.

### **Future Training**

YMCA SPG will provide relevant training to any additional persons where it is deemed that asbestos training would be beneficial at the next available opportunity.

This may include anyone who has particularly requested more information regarding asbestos; or anyone else deemed in a position that will benefit from asbestos training.

## 9.0 - Safe Systems of Work

**A safe system of work is a procedure or adopted policy which should always be followed to ensure that the relevant precautions are taken and that no one is exposed to asbestos whilst at work.**

Any planned maintenance activities, refurbishment, demolition works or works which may impact upon known or suspected asbestos will not take place until an assessment of the task has been carried out by a competent person. This assessment will be undertaken prior to any works being undertaken and will be documented.

**All persons must cooperate with the process of identification, assessment and control of asbestos, and participate in training and induction programmes.**

Employees should be made aware that areas listed as 'No Access' on any Asbestos Register must be presumed to contain asbestos unless there is strong evidence to the contrary. Procedures for those working near known asbestos, including emergency procedures, should also be clearly communicated. In this section, areas of work covered include:

1. Third Party Contracted Works (including all Reactive and Planned Preventative Maintenance (PPM) Works)
2. Project Works
3. Asbestos Removal
4. Unplanned Incidents

### **External Contracted Works**

It is expected that contractors employed to undertake maintenance within properties where YMCA SPG is the duty holder which may disturb the fabric of the building or known or presumed asbestos containing materials have undertaken asbestos awareness training as in accordance with Regulation 10 of CAR 2012. YMCA SPG is not responsible for providing third party contractors commissioned to undertake work on their behalf with asbestos awareness training. Contractors will be required to provide evidence that their operatives have completed asbestos awareness training. Information to the planned works before work commences.

Copies of risk assessments and method statements are to be requested from contractors ahead of their planned works onsite. In return all relevant asbestos information regarding the planned works is shared with the contractor. It is important to note that whoever commissions the works from third party contractors (Responsible Person, Property Managers or other relevant person) is responsible for ensuring that they are provided with all relevant asbestos information.

Should contractors have any queries or should planned works be affected by known, presumed or suspected asbestos they should contact the relevant person commissioning their services so that further investigation can be undertaken.

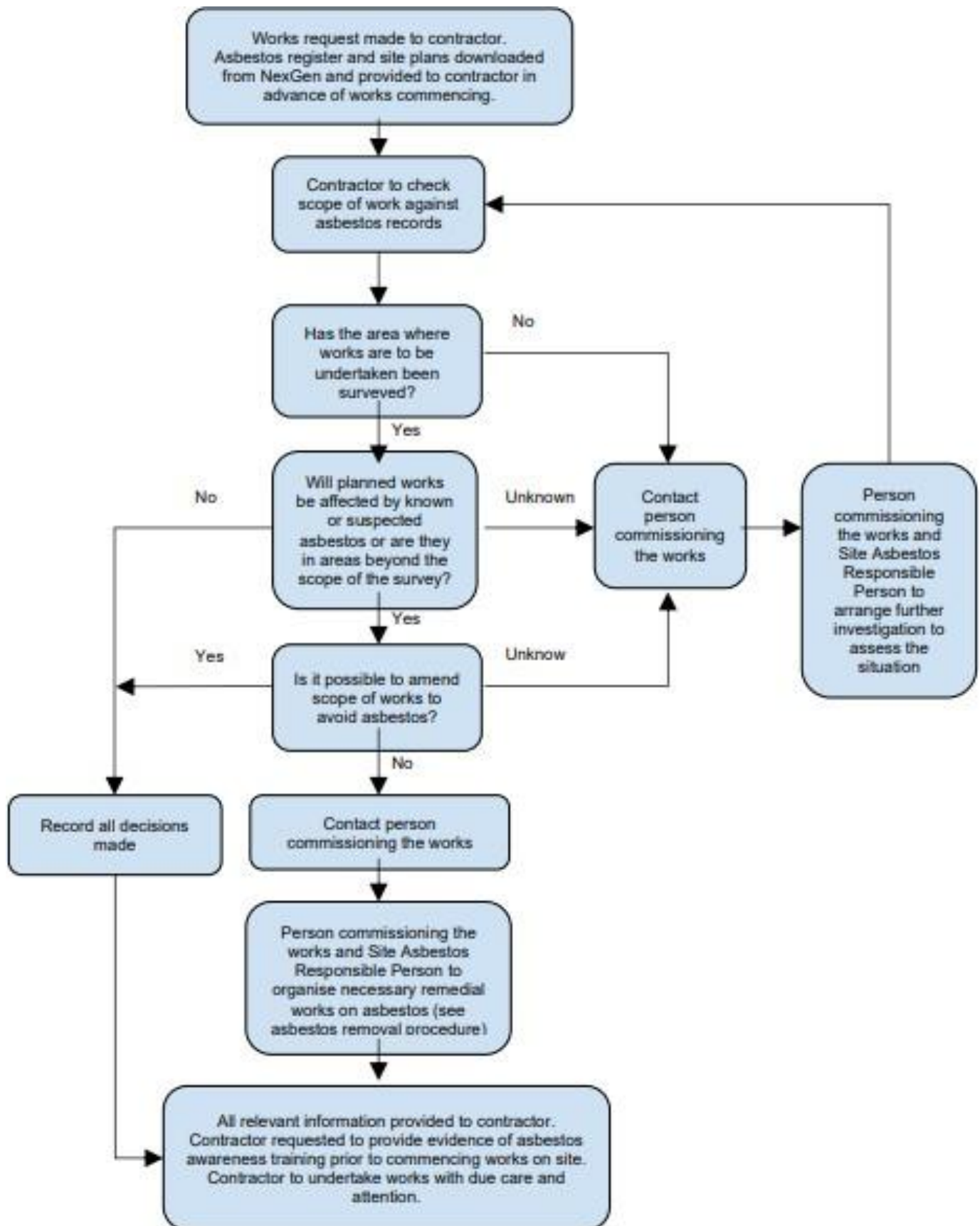
It is just as important to inform all concerned if no asbestos is present but that safe systems of work should always be followed. Should any ACMs be discovered during the works or if it is suspected that asbestos may have been disturbed then the Responsible Person should be notified **immediately**.

All contractors are required to provide copies of their policies in relation to the general provisions of the Health and Safety at Work etc. Act 1974, and asbestos management (where relevant). They are in turn given access to all relevant Asbestos Records.

**All persons must cooperate with the process of identification, assessment and control of asbestos and participate in training and induction programmes.**

**Employees and contractors should be made aware that areas listed as 'No Access' on any Asbestos Register must be presumed to contain asbestos unless there is strong evidence to the contrary. Procedures for those working near known asbestos, including emergency procedures, should also be clearly communicated.**

Flowchart summarising the steps which should be taken to ensure that all third party contracted works undertaken is carried out in a safe manner:



## Asbestos Removal Works

This encompasses all maintenance and project-driven asbestos removal works. It should be noted that the YMCA-SPG asbestos consultant may only engage approved asbestos removal contractors to undertake asbestos removal on behalf of YMCA-SPG. **Under no circumstances should the asbestos removal contractor engage the services of the analysts on behalf of YMCA SPG.** YMCA SPG will engage the services of an asbestos consultant directly, for any analytical works throughout properties where YMCA SPG is the duty holder.

For licensable removal works the appointed contractor must hold:

- A valid Health and Safety Executive License (without restrictions) for the removal of all classes of asbestos material.
- Public liability insurance cover of £10m with specific mention of asbestos removal works given in the policy wording.
- A current Waste Carriers License.
- Valid medical surveillance and appropriate respirator face fit test certificates for removal operatives (who must be in the full-time employment of the contractor).

The appointed asbestos consultants must carry:

- Public liability insurance cover of £10m with specific mention of asbestos related consultancy works given in the policy wording.
- Professional indemnity insurance cover of £5m with specific mention of asbestos related consultancy works undertaken given in the policy wording.
- Where air testing and asbestos bulk sample analysis are carried out:
  - Organisational UKAS accreditation to ISO/IEC 17025, satisfactory performance in the Regular Interlaboratory Counting Exchange (RICE)
  - 'Asbestos In Materials Scheme' (AIMS).
  - Valid and current UKAS accreditation.
- Where, asbestos surveys (as described in HSG264) are carried out:
  - Organisational UKAS accreditation to ISO/IEC 17020.
- Valid medical surveillance and appropriate respirator face fit test certificates

Prior to any asbestos removal works the person commissioning the works will ensure that full survey information is available for the area in question. In the case of refurbishment / demolition works a Refurbishment / Demolition survey as described in HSG 264 will be undertaken as required.

Prior to the commencement of any abatement works the asbestos removal contractor will be expected to:

- Provide relevant method statement and risk assessments for the work.
- Attend any pre-contract site meetings as required.

When appointed, the asbestos consultant will be expected to prepare, review and comment on asbestos removal works specifications and prior to commencement of the works the contractor's method statement on behalf of YMCA SPG.

Where appropriate, the appointed asbestos consultant will oversee the smoke testing, provide air monitoring (including leak testing where appropriate), conduct the Four Stage Clearance procedure and oversee the contractor at all stages of the works. The asbestos consultant will also be expected to attend any pre-start meetings, progress meetings and a handover meeting so that YMCA SPG is always kept fully informed.

On completion of any asbestos remedial works the asbestos consultant will ensure that the person commissioning the work is provided with a completion document. The completion document should include the following where applicable:

- Air monitoring certificates
- Certificates of Reoccupation
- Waste consignment notes
- Removal contractors' method statement
- Statement of cleanliness

The person commissioning the work will ensure that all documents, including the completion document,

are saved to the YMCA-SPG asset database and the relevant intranet property file and available to the Responsible Person upon completion of works.

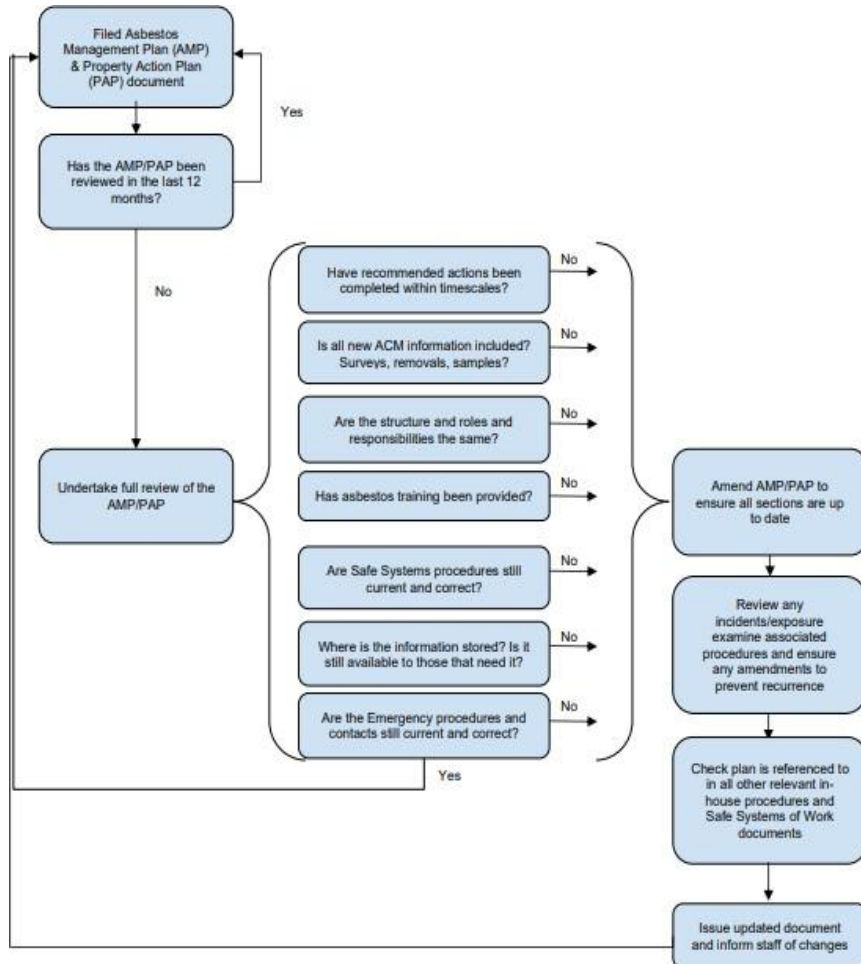
### **Unplanned Incidents**

An assessment will be undertaken following any accidental disturbance of material known or suspected of containing asbestos: all staff will be made aware that any incident, no matter how small, MUST be reported to the Responsible Person as soon as possible. All incidents must be reported on the internal incident accident reporting database in line with YMCA internal procedures - [incident/accident reporting database](#).

More details as to what to do if known or suspected asbestos is disturbed can be found in Appendix 3, Emergency Procedures.

## 10.0 – Monitoring & Reviewing the Asbestos Management Plan

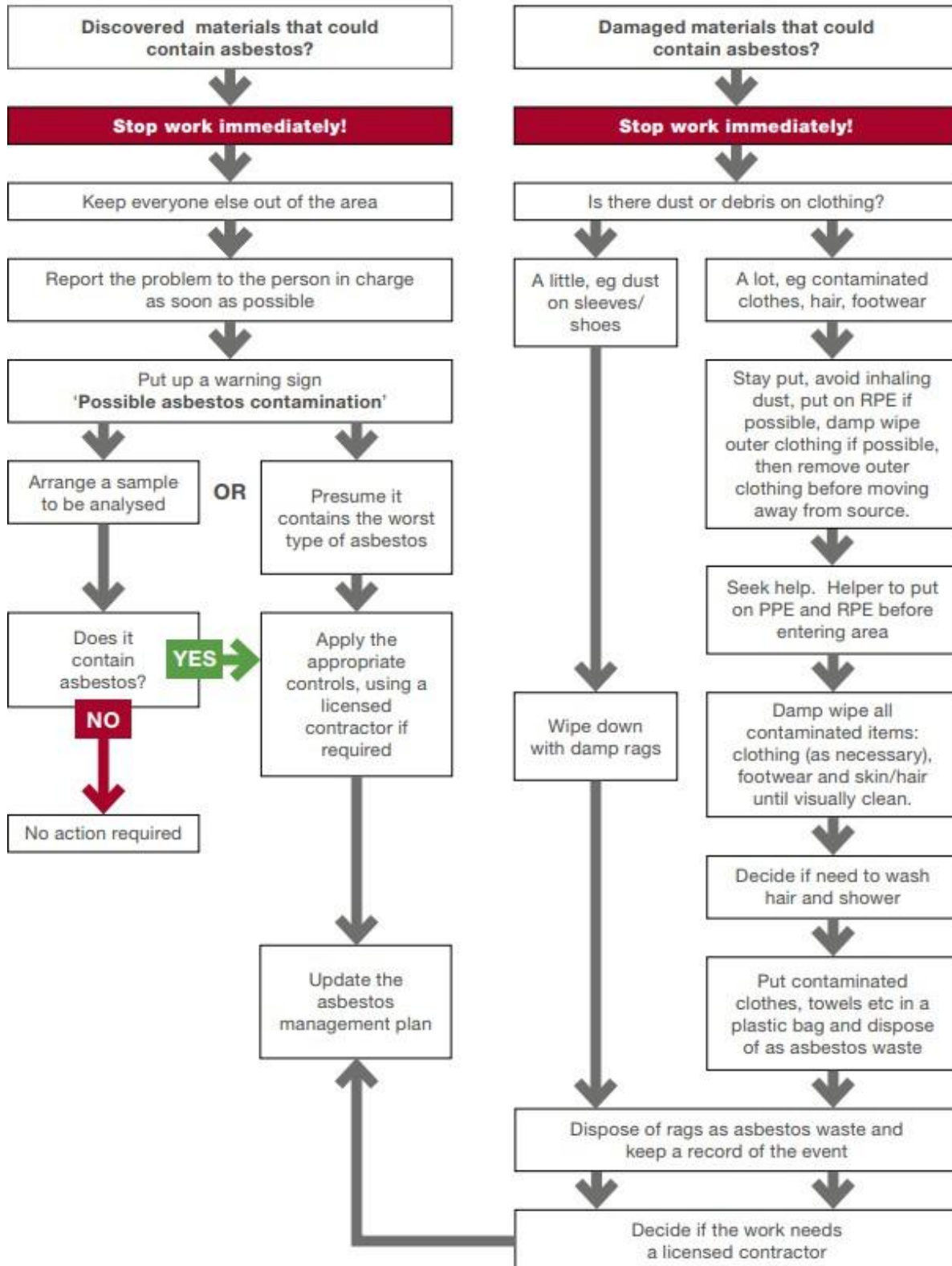
**FLOWCHART: Procedure for review of the Asbestos Management Plan**



## 11.0 - Asbestos Incident / Emergency Procedure

Below is the emergency asbestos procedure taken from EM1, Asbestos Essentials:

### Flow chart



Further supporting information can be found in Appendix 4, Emergency Procedure supporting information.

## 12.0 - References

1. Control of Asbestos Regulations (CAR) 2012
2. The Health & Safety at Work Act (1974)
3. The Management of Health & Safety at Work Regulations (1999)
4. The Construction (Design & Management) Regulations 2015
5. The Workplace (Health, Safety and Welfare) Regulations 1992
6. Managing and working with asbestos, ACOP L143 (2013)

Other pertinent reference documents:

- Asbestos: The Survey Guide HSG 264 (2012)
- Asbestos: The analysts' guide for sampling, analysis and clearance procedures HSG248 (2005)
- A comprehensive guide to managing asbestos in premises, HSG 227 (2002)

## Appendix 1 – Survey Type Specification

### 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 which could be damaged or disturbed during normal occupancy, including foreseeable maintenance and installation, and to assess their condition.

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, i.e. it will depend on factors such as the type of building, the nature of construction, accessibility etc. A management survey should include an assessment of the condition of the various ACM's and their ability to release fibres into the air if they are disturbed in some way. The '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 ACM's. However, a management survey can also involve presuming the presence or absence of asbestos.**

By presuming the presence of asbestos, the need for sampling and analysis can be deferred until a later time (e.g. before any work is carried out). However, this approach has implications for the management arrangements. The duty holder bears potential additional costs of management for some non-ACMs. Any work carried out on 'presumed' materials would need to involve appropriate contractors and work methods in compliance with CAR 2012 irrespective of whether the material was an ACM or not.

Alternatively, before any work starts, sampling and analysis can be undertaken to confirm or refute the presence of asbestos. The results will determine the work methods and contractors to be used. The 'presumption' approach has several disadvantages: because it is less rigorous, it can lead to constant obstructions and delays before work can start, and it is more difficult to control, see *A comprehensive guide to managing asbestos in premises*. 'Default' presumptions may also lead to unnecessary removal of non-ACMs and their disposal as asbestos waste. But default presumptions may be suitable in some instances, e.g. 'small' or simple premises, as part of a client's management arrangements.

All areas should be accessed and inspected as far as it is reasonably practicable. Areas should include under floor coverings, above false ceilings, and inside risers, service ducts, lift shafts etc.

**Surveying may also involve some minor intrusive work**, such as accessing behind fascia and panels and other surfaces or superficial materials. The extent of intrusion will depend on the degree of disturbance that is or will be necessary for foreseeable maintenance and related activities, including the installation of new equipment/cabling.

Surveyors should come prepared to access such areas (i.e. with the correct equipment etc.). Management surveys are only likely to involve the use of simple tools such as screwdrivers and chisels. Any areas not accessed must be presumed to contain asbestos.

The areas not accessed and presumed to contain asbestos must be clearly stated in the survey report and will have to be managed on this basis, i.e. maintenance or other disturbance work should not be carried out in these areas until further checks are made.

Management surveys should cover routine and simple maintenance work. However, it has to be recognised that where 'more extensive' maintenance or repair work is involved, there may not be sufficient information in the management survey, and a localised refurbishment survey will be needed. A refurbishment survey will be required for all work which disturbs the fabric of the building in areas where the management survey has not been intrusive. The decision on the need for a refurbishment survey should be made by the duty holder.

### Refurbishment and demolition surveys

A refurbishment and demolition survey is needed before any refurbishment or demolition work is carried

out. 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 and demolition survey may also be required in other circumstances, e.g. when more intrusive maintenance and repair work will be carried out or for plant removal or dismantling.

There is a specific requirement in 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 (e.g. removal of partitions, walls, units etc.).

Under CDM, 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 that the asbestos risks can be addressed. In this type of survey, where the asbestos is identified so that it can be removed (rather than to 'manage' it), 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 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 which 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, which 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. Ideally, the building should not be in service, and all furnishings removed. For minor refurbishment, 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 (e.g. 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 (e.g. where there has been significant destruction), reassurance air sampling. Under no circumstances should staff remain in rooms or areas of buildings when intrusive sampling is performed.

## Appendix 2 – Assessment Algorithms

### Material Assessment

| Assessment factor                     | Score | Examples of Score Variables                                |
|---------------------------------------|-------|------------------------------------------------------------|
| Product Type (or debris from product) | 1     | Etonite, cement, lino, paints, artex etc.                  |
|                                       | 2     | AIB boarding, gaskets, ropes, textiles etc.                |
|                                       | 3     | Thermal insulation                                         |
| Extent of damage / deterioration      | 0     | No visible damage                                          |
|                                       | 1     | Low damage – e.g. scratches                                |
|                                       | 2     | Medium damage – e.g. breakage of material revealing fibres |
|                                       | 3     | High damage – visible debris                               |
| Surface Treatment                     | 0     | Composite materials – Etonite, vinyl's, painted AC         |
|                                       | 1     | Enclosed sprays and lagging, encap. AIB, unsealed AC       |
|                                       | 2     | Unsealed AIB, encap. Lagging and sprays                    |
|                                       | 3     | Unsealed lagging and sprays/debris                         |
| Asbestos Type                         | 1     | Chrysotile                                                 |
|                                       | 2     | Amphibole asbestos excluding Crocidolite                   |
|                                       | 3     | Crocidolite                                                |

## Material / Accessibility Score

Following the rating of a material using the above criteria, the resulting aggregated additive material score may be assessed in terms of accessibility to derive an assessment of initial risk level as follows:

|                           | Very Low Risk (2-4) | Low Risk (5-6) | Medium Risk (7-9) | High Risk (10-12) |
|---------------------------|---------------------|----------------|-------------------|-------------------|
| Normally Inaccessible (1) | R3                  | R3             | R3                | R2                |
| Periodically Accessed (2) | R3                  | R3             | R2                | R1                |
| Frequently Accessed (3)   | R3                  | R2             | R1                | R1                |

The level of access to the ACM determines how easily the product can be reached by the building occupants which could result in a disturbance that causes fibre release, it relates purely to access and does not consider product type. The above is defined by the following:

1. Normally inaccessible or occasionally accessed: The ACM will not be accessed or is unlikely to be disturbed.
2. Periodically accessed: The ACM is likely to be disturbed occasionally.
3. Frequently accessed: The ACM is routinely and easily disturbed.

## General Interpretation of Risk Assessment Level

| Risk Assessment Level | <b>Interpretation of the Recommended Control Action</b><br><i>The risk level assessment is determined based on information collated during the survey.<br/> The risk assessment level needs to be reviewed periodically, (normally in line with a frequency defined in an asbestos management plan) to verify its validity and prior to any refurbishment work within the building/ site.</i> |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>R1</b>             | <b>immediate implementation</b>                                                                                                                                                                                                                                                                                                                                                               |
| <b>R2</b>             | <b>as soon as practicable - <i>in interim period material should be regularly inspected and its management planned for</i></b>                                                                                                                                                                                                                                                                |
| <b>R3</b>             | <b>not immediately necessary - <i>material should be regularly inspected and its management planned for</i></b>                                                                                                                                                                                                                                                                               |

## Priority Risk Assessment

Under CAR 2012 the duty holder is required to undertake a Priority Risk Assessment using their detailed knowledge of the activities carried out on the premises.

The priority assessment can only be carried out with the detailed knowledge of all these factors. The surveyor can help in this process, by obtaining information which will contribute to the priority assessment, particularly in small or simple premises where information on occupancy and use is straightforward. However, such help must be undertaken with caution.

The combined material and priority assessment results should be used to establish the priority for those ACMs needing remedial action and the type of action that will be taken. There are various remedial options available: in many cases the ACMs can be protected or enclosed, sealed or encapsulated, or repaired. These options should be considered first. Where such actions are not practical, ACMs should be removed.

Further guidance is provided within HSE document HSG227; A comprehensive guide to managing asbestos in premises and HSG264 Asbestos: The survey guide.

| Assessment Factor                | Score    | Score Variables                                                                 |
|----------------------------------|----------|---------------------------------------------------------------------------------|
| <b>Normal occupant activity</b>  |          |                                                                                 |
| Main type of activity in area    | 0        | Rare disturbance activity (e.g. little used storeroom)                          |
|                                  | 1        | Low disturbance activities (e.g. office type activity)                          |
|                                  | 2        | Periodic disturbance (e.g. industrial/vehicular activity which may contact ACM) |
|                                  | 3        | High levels of disturbance (e.g. fire door with AIB sheeting in constant use)   |
| Secondary activities for area    | As above | As above                                                                        |
| <b>Likelihood of disturbance</b> |          |                                                                                 |
| Location                         | 0        | Outdoors                                                                        |
|                                  | 1        | Large rooms or well-ventilated areas                                            |
|                                  | 2        | Rooms up to 100 square meters                                                   |
|                                  | 3        | Confined spaces                                                                 |
| Accessibility                    | 0        | Usually inaccessible or unlikely to be disturbed                                |
|                                  | 1        | Occasionally /likely to be disturbed                                            |
|                                  | 2        | Easily disturbed                                                                |
|                                  | 3        | Routinely disturbed                                                             |
| Extent / Amount                  | 0        | Small amounts or items (e.g. gaskets or strings)                                |
|                                  | 1        | < 10 m <sup>2</sup> or <10 m pipe run                                           |
|                                  | 2        | >10 m <sup>2</sup> to 50 m <sup>2</sup> or 10 m to 50m pipe run                 |
|                                  | 3        | >50 m <sup>2</sup> or >50m pipe run                                             |
| <b>Human exposure potential</b>  |          |                                                                                 |
| Number of occupants              | 0        | None                                                                            |
|                                  | 1        | 1 to 3                                                                          |
|                                  | 2        | 4 to 10                                                                         |
|                                  | 3        | >10                                                                             |
| Frequency of use of area         | 0        | Infrequent                                                                      |
|                                  | 1        | Monthly                                                                         |
|                                  | 2        | Weekly                                                                          |
|                                  | 3        | Daily                                                                           |
| Average time area is in use      | 0        | <1 hour                                                                         |
|                                  | 1        | >1 to <3 hours                                                                  |
|                                  | 2        | >3 to <6 hours                                                                  |
|                                  | 3        | >6 hours                                                                        |

| Maintenance activity              |   |                                                                                                               |
|-----------------------------------|---|---------------------------------------------------------------------------------------------------------------|
| Type of maintenance activity      | 0 | Minor disturbance (e.g. possibility of contact when gaining access)                                           |
|                                   | 1 | Low disturbance (e.g. changing light bulbs in asbestos insulating board ceiling)                              |
|                                   | 2 | Medium disturbance (e.g. lifting one or two asbestos insulating board ceiling tiles to access a valve)        |
|                                   | 3 | High levels of disturbance (e.g. removing a number of AIB ceiling tiles to replace a valve or for re-cabling) |
| Frequency of maintenance activity | 0 | ACM unlikely to be disturbed for maintenance                                                                  |
|                                   | 1 | <1 per year                                                                                                   |
|                                   | 2 | >1 per year                                                                                                   |
|                                   | 3 | >1 per month                                                                                                  |

## Appendix 3 – Glossary of Terms

**ACM:** Asbestos Containing Material. A complete definition as to the percentage and type of asbestos content is given in the Asbestos Register.

**AIB:** Asbestos Insulation Board. This product is a lightly compressed board made from asbestos fibre and other filler materials.

**ACOP – Approved Code of Practice:** Guidance document giving advice on the preferred means of compliance with the Control of Asbestos Regulations 2012. Two ACOPs, L127 (The management of asbestos in non-domestic premises) and L143 (Work with materials containing asbestos) have been consolidated into the single revised ACOP L143 (Managing and working with asbestos – second edition).

**Asbestos:** A naturally occurring, fibrous, silicate mineral. The Control of Asbestos Regulations, 2012 refers to any material or product containing any of the asbestos types.

**Asbestos Register:** A summary list of all identified items containing asbestos, their condition, location, any comments or recommendations and the type and extent of asbestos present. These documents are produced after an asbestos survey and should contain all analytical results, drawings, and a full introduction and methodology.

**Control measure:** Something that will *reduce* the risk posed by that hazard.

**Date for Action:** This details the timescale that remedial option should be undertaken. As and when any works are undertaken, all Asbestos Records must be updated.

**Encapsulation – Recommendation:** Some exposed or damaged asbestos material may require encapsulation that can significantly reduce the risk posed by the material. Once encapsulated it may be suitable to simply manage the asbestos through an effective reinspection regime. The re-assessment of the material will dictate this outcome.

**Extent:** Indicates the length, volume, or area of the asbestos containing material.

**Hazard:** Something that has the *potential* to harm a person or persons.

**Identified Asbestos:** Refers to a brief description of the material found to contain asbestos.

**Location:** The exact location of the asbestos – the original survey report should be consulted to give more detailed information.

**Manage – Recommendation:** Asbestos that is in good condition and is unlikely to be disturbed can be simply managed. However, an appropriate reinspection regime will still need to be implemented to ensure that the condition of the material or building use does not change.

**Material Assessment:** assesses the type and condition of the ACM and the ease with which it will release fibres if disturbed.

**MMMF:** Man Made Mineral Fibre. These products are often used as an asbestos alternative and include products such as fibreglass.

**PPE – Personal Protective Equipment:** refers to protective clothing (coveralls), hard hats, goggles, safety boots or other gear designed to protect the wearer's body or clothing from injury.

**Priority Assessment:** assesses the likelihood of someone disturbing the ACM.

**Removal – Recommendation:** This indicates that, based on the assessment conducted, the recommended approach is to have the asbestos physically removed. Recommendations are based on the parameters available at the time. New information or a change in circumstance may alter these

recommendations. All products falling under the Asbestos Licensing Regulations will require a licensed contractor.

**Risk:** The *likelihood* of that hazard causing harm

**Risk Assessment:** Risk rating given to each identified item of asbestos which incorporates factors such as the location and condition of the material, its likelihood of being disturbed, the materials use, and an indication of how urgent any remedial works may be.

**Risk Score:** This is the overall risk score that has been derived for completing and adding together the Material and Priority Assessments. It states the overall risk that the item of asbestos represents in terms of likelihood of exposure.

**RPE – Respiratory Protective Equipment:** refers to protective equipment worn to protect the respiratory system (for example, half mask, and full-face mask)

## Appendix 4 – Emergency Procedure Support Information

Where there is a potential for contamination of people or their clothing (instances of significant damage or debris) all persons suspected of being contaminated shall (wherever practicable):

1. Stop working immediately.
2. Carefully remove outer layers of clothing (including footwear).
3. Remove clothing by carefully turning inside out to avoid liberating any attached fibres.
4. Wash down with damp towels or baby wipes (if available).
5. Wherever possible, close windows and doors as you leave the affected area to minimise the risk of ACM spreading elsewhere.
6. All and any suspect items or contaminated clothing, and any used wipes, towels etc. are to be left altogether in the immediate vicinity of the incident - preferably in a polythene bag.
7. Remain on site, away from the affected area, until a YMCA SPG appointed asbestos consultant and removal contractor can arrive. If it is not possible to remain on site in a safe area, the building must be vacated using the minimal distance to the external emergency muster zone. \*See 'Transit to muster zone below.
8. Contact must be made with the Responsible Person (either by mobile phone or by non-contaminated personnel) to report the following information:
  - a. Name of operative and company worked for
  - b. Number of Operatives within the area
  - c. Location within the building
  - d. Nature of the disturbance, including any information pertinent to the disturbance  
*Including, what tools were used, mechanic or hand, gentle abrasion or significant breakage etc.*
9. YMCA-SPG's asbestos consultant and removal contractor will ascertain the best course of action to assist operatives in safe decontamination. This may include the putting on of an orinasal half mask and transit overalls, if a further transit is required. Suspected dust and debris may be required to be removed using appropriate removal techniques, including the wipe down with damp cloths, or the use of an H-Type Vacuum.
10. Once personnel are deemed suitable for transit (limiting potential further contamination), operatives will be escorted to the Decontamination Shower Unit supplied by the licensed asbestos removal contractor. The Operative will be instructed on how to use the facilities, including transit route through the DCU and the putting on of clean overalls.

### Transit to Muster Zone

1. Where it is not possible to remain in the vicinity of the sealed suspected contaminated area, a transit to an external muster zone must be made. This route must be known prior to transit and unless specified otherwise, will be the nearest emergency exit leading out of the building to the designated assembly point – as per the Fire Action Notices displayed throughout the building.
2. Once the transit has been completed, this route must be deemed contaminated until proven otherwise. As a result, further access to this transit must be controlled, and the appropriate PPE/RPE measurements taken.
3. Do not attempt to sweep, vacuum or remove any debris if the nature of the damaged material is not known.
4. Where there is no electrical hazard, smaller damaged areas may be damped down with a fine mist water spray, to which a little detergent has been added. Apply to allow the spray to "fall" onto the affected area.
5. Where the contaminated area is within a designated fire escape route, additional contingency measures may be required - these will be managed by the Property Manager in conjunction with the Project Manager. In some instances, it may be necessary to close the entire building and await further instruction.
6. Where exposure to asbestos fibres has been confirmed, or cannot be discounted, a YMCA SPG approved asbestos consultant will normally confirm, employees should make a record of personal exposure using organisational recording procedures.

### Dealing with the potentially contaminated area

1. The asbestos records will be checked to identify the material.
2. Where asbestos is identified or the information is inadequate, the Responsible Person will appoint an asbestos consultant to undertake a survey and risk assessment of the area, to include bulk

samples and reassurance air tests.

3. If the material is found to be non-asbestos, the area will be reopened.
4. Should the material be found to contain asbestos, to correct the situation, a scope of work must be agreed with the asbestos consultant and an approved asbestos removal contractor will be appointed to repair or remove the material as soon as possible. The removal contractor will submit notification to the HSE where appropriate.
5. The area will remain closed until the asbestos works are complete and the asbestos analyst has issued the relevant clearance certificates. It may be necessary to programme further asbestos removal works.
6. A RIDDOR reportable accident report may be required to be completed by the contractor or Responsible Person as soon as possible after the incident. In any case the report must be retained by the organisation.

## Appendix 5 – Asbestos Management Regulations

Information regarding the scope and specification of asbestos survey and/or re-inspection must be clarified before the information in the report is relied upon; it is possible that asbestos remains in previously inaccessible areas or in areas outside the scope of previous surveys.

It should be further noted that the type of survey conducted may not necessarily be suitable for the tasks that is being planned with a premises. A definition of different survey types can be found in Appendix 1, Survey Type Specification.

### Management Requirements

1. **It is recommended that asbestos is managed / reinspected periodically** where ACMs are in a stable condition. They should be managed, and safe systems of work should be put in place. In general, such items require no remedial or removal work, but their condition must be regularly monitored to ensure that the risk is being effectively managed.
2. All personnel working in the building that may encounter asbestos must be informed that asbestos has been identified within the building, and that any damage, no matter how minor, must be reported to the Responsible Person /Head of Health and Safety immediately.
3. Any persons working specifically near any items identified as containing asbestos must be informed as to the nature and extent of asbestos identified within.
4. All ACMs should be reinspected at least every 12 months.

## Appendix 6 – List of Duty Holders Properties

This section lists the YMCA-SPG properties and provides a link to the asbestos consultants' portal, <https://web.lucion.co.uk> where the current asbestos survey and re-inspections are available and details of the recommended management options for the following properties:

1. Albert Rd, 71 - HMO
2. Balaclava Rd, 18 - HMO
3. Bath Road – Acquired July 2025
4. Britwell - Hostel
5. Brookscroft, (flats 1-13 & 14-23) - Hostel
6. Butlers Close Block A & B – Acquired July 2025
7. Chalvey - Hostel
8. Clockworks - Hostel
9. Ealing Common - Hostel
10. Edward House - Young People Project
11. Fulbourne Rd 247 - HMO
12. Fulbourne Rd 279 - HMO
13. George William Court/Y Cube – Self-contained accommodation
14. Greenford - Hostel
15. Hanwell - Hostel
16. Hawker Centre – Community Building
17. Haynes Close, 10 - HMO
18. The Eades (x4 flats only)  
John Innes – Community Building – **Currently Vacant**
19. Langdown House (4 units) - Sheltered Accommodation
20. Marsham Court – Hostel
21. mYPads 1-10 – Self-contained accommodation
22. mYPads 11-30 – Self-contained accommodation
23. Northolt Grange – Hostel
24. Parsons Green - Hostel
25. Rodney House (4 units & office) - Sheltered Accommodation
26. Roxeth Gate - Hostel
27. Second Ave - HMO
28. Shernhall St, 5 - HMO
29. South Ealing - Hostel
30. Spruce Hills 26 - HMO
31. Spruce Hills 38 - HMO
32. Stephen House – Young People Project
33. St Agnes – Acquired July 2025
34. St Margarets – Acquired July 2025
35. St Stephens – Acquired July 2025
36. Surbiton, Victoria Rd, 48 - Hostel
37. Uxbridge - Hostel
38. Ventura House - Hostel
39. Victoria Ave, 16 - HMO
40. Victoria Ave, 18 - HMO
41. Walthamstow - Hostel & sports centre
42. Wimbledon – Hostel & sports centre
43. Woodlands - HMO