



White Paper

Reviewing your asbestos management plan

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I first got involved with asbestos as an analyst in the late 1980's. At that time, an analyst was usually employed by the asbestos removal company. This was a challenge as there was no independence - no reporting directly to the customer, rather via the asbestos removal company - and this led to potential poor strips being overlooked by the analyst and clearance certificates issued.

It gave me great experience of knowing what challenges the removal operatives faced and things to look out for when undertaking clearance tests. Little did I know that an area that historically passed the clearance test would cause so much debate 35 years later, with removal companies now advocating removal of these small amounts of asbestos instead of managing in situ, even when the area passes a reassurance air test.

More recently and following the update in the Health and Safety Executive's (HSE) publication on the Asbestos Management Plan (6th December 2023, although first advocated on 6th April 2012), many organisations have not updated their asbestos management plan, leading to fees for intervention in the public sector and independent school markets. In essence, the plan requires more detail and specifically looks at three areas where additional information is required.

This white paper outlines:

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1. Increased responsibility

The first area is responsibility. Traditionally, we have always had the Duty Holder, Appointed Responsible Person and Deputy Responsible Person, but now a further thirteen responsibilities have been identified. While some of these duties may fall under the above persons, especially in large organisations they may now need additional persons to be included in the responsibility tree. Specific responsibilities are required for who is responsible for managing the:

1. Asbestos register and site plans (preparation, review and update);
2. Condition monitoring of ACMs;
3. Asbestos management plan (preparation, review and update);
4. Surveys and specialist asbestos advice, for example, air monitoring, bulk sampling etc.;
5. Management of service providers. Asbestos surveys and re-inspections, including competency checks, contractual and reporting arrangements and quality checks;
6. Delivery of 'site asbestos information briefing' to site staff (detail the location of ACMs in specific areas they work. Include an instruction not to disturb ACMs. Explain what must be done if ACMs become damaged);
7. Organisation of staff training, for example, duty to manage, asbestos awareness and non-licensed work;
8. Pre-site arrival checks of contractors. Check those doing asbestos work have, had appropriate asbestos training, seen a risk assessment and plan of work detailing suitable control equipment and procedures;
9. The asbestos information. At planning stage for any refurbishment, installation, demolition work;
10. Delivery of contractor site inductions. Deliver inductions once you are satisfied that information about the presence of asbestos has been understood, to verify pre-site check, issue a permit-to-work or equivalent;
11. Collation and storage of evidence. Following asbestos removal, repair work and safe site reoccupation, for example, certificate of reoccupation, statement of cleanliness;
12. Asbestos register and site plans providing it to emergency services; and
13. Resilience testing of the asbestos management plan. This is to check the procedures work for a range of scenarios, for example: planned and unplanned work, accidental disturbance of ACM.



2. Better communication

More specifics are required with the asbestos management plan when considering communication with the following aspects required:

- The strategy for sharing information about the location of ACMs on site;
- How the asbestos register is maintained as a 'live' current document;
- Where information is kept;
- How to access that information; and
- What to do in the event of an accidental disturbance including emergency contacts.

3. Detailed training considerations

Finally training, a training needs analysis may be helpful. Determine the content of asbestos training by the role and responsibilities assigned and include those relating to asbestos management detailed in this plan. Asbestos awareness training is a minimum requirement for those who could disturb asbestos, such as maintenance staff or those who supervise or influence the work, but it does not allow the person to work on asbestos.

Non-licensed work on asbestos requires non-licensed training and this should be specific to the task. Detail of the training is also required and may include:

- The extent of asbestos-containing materials in buildings;
- How to commission and understand asbestos surveys;
- How to assess the risks and write a management plan;
- Communication plans for asbestos management;
- How to manage minor work with asbestos; and
- How to commission asbestos removal firm.



4. Other management plan requirements

With better communication, training and responsibility under scrutiny, it is easy to forget the other important parts of the asbestos management plan that still need to be regularly reviewed and updated if changes occur.

There is still a requirement for an overview, primarily describing what type of survey(s) have been undertaken, where your asbestos is and most importantly the caveats of the areas the survey didn't cover.

You also need to consider and document the arrangement for asbestos condition assessments, areas that require permit to work where asbestos is situated and any action plan for removal, remediation or ongoing management.

If you undertake maintenance tasks on asbestos containing materials, then you need to document work that can be carried out by non-licenced trained works and licenced contractors.

An incident and accident log is also very useful to determine if there are gaps in your management plan or any trends that can be traced.

Finally, the last piece of the successful asbestos management puzzle is to review all aspects of the management plan an area that often gets forgotten. This should include as a minimum, a review of the asbestos management plan itself, including register and site plans, every 12 months.

It should also be reviewed if there is reason to believe that circumstances have changed, for example:

- Changes to organisation or personnel;
- Change of use of building;
- Work being carried out; or
- ACMs removed or repaired (note: the asbestos register should be updated at any time following any action on, or deterioration of, an ACM); and
- Update the plan, including register and site plans, accordingly.

Develop a review procedure that could include auditing sections of the plan through the year. Key aspects to check include:

- How the plan has been implemented over the year; and
- If everything in the incident log has been actioned, root causes have been identified and changes implemented as necessary.

It may also be helpful to undertake resilience testing by using the plan for realistic scenarios, for example a burst pipe, installing a fire alarm system, uncovering something which is thought to be asbestos or damaging a known asbestos containing material.

5. Conclusion

With increased documentation relating to fire and asbestos, I think it will be not too long before other health and safety disciplines, e.g. Legionella, has additional documentation requirements. Practising this management review can only stand you in good stead for the potential of other future health and safety requirements.



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