

Compliance Policy

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1 Policy Information

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Responsible Director	Executive Director of Assets & Development
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2 Policy Statement

South Liverpool Homes (SLH) is committed to ensuring, so far as is reasonably practicable, the health, safety and welfare of our colleagues, tenants and any other persons who may work on, occupy, visit, or use premises under our control, or who may be affected by its activities or services.

This policy details SLH's approaches to the management of:

- Fire safety
- Gas safety
- Asbestos management
- Electrical safety
- Water hygiene
- Lift safety

It details how SLH, as far as is reasonably practicable, will minimise the risks associated with these compliance areas by minimising exposure through the use of proper control measures and working methods.

The policy applies to all parts of SLH including the landlord obligations through South Liverpool Homes, responsibilities for commercial properties through Avela, responsibilities for the provision of works through Avela Home Service and through homes managed on behalf of other landlords. Individual prescriptive procedures for all compliance areas support the implementation of this policy.

3 Policy Aims

The aims of this policy are to:

- Comply with all applicable legislative and regulatory requirements to ensure the health and safety of those living, visiting or working in homes or properties that the group owns or manages
- Detail remedial and preventative action
- Maintain documentation and records for the management of all compliance areas
- Ensure a tenant focused service is delivered

4 Responsible Persons

Each area of the Compliance Policy is fully supported by a detailed operating procedure with clear defined areas of responsibility. This is supported by a Safety Matrix detailing specific actions and responsibilities across the Asset Team. The table below provides an overview of responsibility for each area:

Compliance Area	Duty holder	Direct Management	Responsible person	Deputy
Fire safety	Chief Executive	Executive Director of Assets & Development Head of Assets & Delivery	Responsible Person: Chief Executive Competent Person: Building Safety Lead	Competent Person: Head of Assets & Delivery
Gas safety	Chief Executive		Building Safety Lead	Head of Assets & Delivery
Asbestos	Chief Executive		Building Safety Lead	Head of Assets & Delivery
Electrical safety	Chief Executive		Building Safety Lead	Head of Assets & Delivery
Water hygiene	Chief Executive		Building Safety Lead	Head of Assets & Delivery
Lift safety	Chief Executive		Building Safety Lead	Head of Assets & Delivery

5 Asset Reconciliation

SLH follow a robust process for ensuring any acquisitions/disposals of stock is reconciled with our compliance legislative and regulatory requirements. This ensures that appropriate compliance testing is undertaken.

6 Access Arrangements

It is an obligation for SLH tenants to provide access to their homes for all compliance checks and maintenance as outlined in tenancy agreements. SLH take a proactive approach to gaining access and in circumstances where this is denied, will take strong and swift action to legally gain access. A Compliance Access Procedure is in place to detail the steps that SLH will take to gain access and identifies legal action that will be taken.

7 Use of Contractors

SLH will ensure the procurement of competent contractors with ongoing audits/monitoring of performance along with contract delivery reviews periodically and at the end of the contract in accordance with the Procurement Policy. Ensuring all contractors have appropriate accreditation where required.

8 Fire Safety

SLH will comply with all relevant legislation in managing fire safety by completing annual fire risk assessments (FRA's) in communal areas containing flats, independent living homes and commercial properties. Type 3 Fire Risk Assessments are completed annually. SLH will employ a third party fire safety auditor to complete annual risk assessments and review current arrangements in place for the management of fire safety.

As a result of the FRA's, SLH will:

- Establish and implement a fire safety management plan
- Identify and implement reasonably practicable control measures to control risk of fire and monitor all fire related incidents
- Establish procedures for the ongoing identification of hazards and implement the necessary controls
- Ensure training requirements and relevant competencies are completed for those who have responsibility for the management of fire safety

8.1 Control Measures

As part of SLH's response to the legislative requirements to managing fire safety the following control measures will be implemented:

- All homes will have hard wired smoke alarms installed
- All smoke alarms will be tested annually as part of the gas safety check
- Undertake fire door inspections where legally required in multi-occupied residential buildings
- Provide to residents of all multi-occupied residential buildings with two or more sets of domestic premises (that have common parts) information on the importance of fire doors to a building's fire safety
- Employ competent contractors to carry out inspections and maintenance of Fire Detection Warning Systems, Emergency Lighting and Fire Fighting Equipment

8.2 New Build

SLH will ensure that designs for new build and any refurbishment or alteration of homes meet all relevant legislative and regulatory requirements in fire safety and reduces as far as is reasonably practicable the risks posed by fire.

8.3 Communal Areas

SLH has a zero tolerance approach to items left in communal areas; the aim of management of communal areas is for them to be sterile environments which do not impact on the spread of fire or the evacuation process in the event of an emergency.

In line with their tenancy agreements and / or leases, those in communal living must not:

- Store or recharge mobility scooters, e-scooters, e-bikes or any other electrical device in any internal or external communal areas
- Store personal affects, unwanted goods, rubbish or other items

Where tenants disregard this and pose a fire safety risk, SLH will ensure action is taken in line with the obligations set out in the tenancy agreement and reserve the right to remove goods from the communal area.

8.4 Record Keeping

All FRA's, monthly block inspections and maintenance records will be kept electronically within both the Specialist Contractors systems, SLH's asset management system and housing management system.

9 Gas Safety

This policy sets out SLH's responsibilities to comply with the relevant legislation and guidance on the safe installation, maintenance and use of gas systems including gas fittings, appliances and flues in the properties we own and manage. We have strong procedures to underpin the policy to ensure the objectives are met.

9.1 Annual Gas Safety Checks

We complete gas servicing on all tenanted properties at no more than 12-month intervals. A Landlords Gas Safety Record (LGSR) will include the following information:

- Description and location of each appliance
- Name, gas safe registration number and signature of the engineer who completed the check
- Date of when the appliance was checked
- Property address at which the appliance or associated fixtures is installed
- Any defect identified and any action taken to remedy it
- Confirmation of the results of operational safety checks carried out on the appliances
- Record location and results of smoke alarm testing

9.2 Corrective Actions

Whilst completing a gas safety check if the registered engineer discovers that a gas appliance is faulty or in need of a repair they will rectify if practicable to do so or will make safe which can include isolating a faulty appliance or the incoming gas feed. A follow up appointment will be made by the engineer whilst at the tenant's home.

9.3 Removal of Gas Fires from Tenanted Homes

If during a gas safety check a fire is deemed unsafe it will be disconnected immediately and a warning notice attached. SLH will not install or replace a gas fire and will within seven days of a gas fire being disconnected write to the tenant with an appointment to remove the fire and complete the following remedial works:

- Block up the fire opening
- Install or upgrade a radiator in the room where the fire has been disconnected
- Replace or make good any damage caused by removing the fire
- Make good any decoration

9.4 Carbon Monoxide Alarms

SLH will install a carbon monoxide alarm (CO) in every room which is used as living accommodation containing a fixed combustion appliance (excluding gas cookers) and will test those alarms during the annual gas safety check and replace if defective.

SLH will ensure CO alarms are repaired or replaced once informed and found that they are faulty.

9.5 Maintaining Records

As a minimum, SLH will maintain the most recent two annual LGSR certificates from the date of inspection and will ensure that all tenants receive a copy of the new LGSR within 28 days of the safety check being completed.

SLH appoint a third-party specialist contractor to complete quality control checks to provide assurance on the validity of completed LGSR certificates in line with the relevant regulations.

SLH use a Compliance Document Management System (TCW) to audit all LGSR certificates. This system has been specifically designed for landlords to gather, analyse and manage their gas compliance documents.

10 Asbestos

SLH will ensure the effective management of asbestos (ACM's – asbestos containing materials) and will take steps to minimise risk to tenants, colleagues, contractors and members of the public, adhering to all compliance requirements in relation to the Control of Asbestos Regulations 2012 (CAR 2012).

SLH in accordance with the Health and Safety Guidance document HSG264 will carry out the following:

- **Refurbishment and Demolition Surveys** – this type of intrusive asbestos survey will be carried out to locate as far as reasonably practicable the presence of any ACM's, even materials within the fabric of the building, to ensure that refurbishment and maintenance works to SLH properties are undertaken safely.
- **Management Surveys** – this type of survey will be carried out to find the extent of any suspected ACM's for safe normal occupancy in properties owned or managed by SLH

All properties having asbestos containing materials will be recorded in SLH's asbestos register.

Through planned investment, empty homes works and reactive works SLH will carry out surveys and record findings of surveys for all types of properties that SLH own and manage.

10.1 Treatment or Removal of Asbestos Containing Materials

SLH will remove or treat ACM's in accordance with the Approved Code of Practice (ACoP). ACM's will not be automatically removed. A risk assessment will be carried out by a competent person to determine what remedial works are to be carried out or if removal is required.

10.2 Notification to Tenants

The very word asbestos can ring alarm bells, often unnecessarily. SLH produce information which is available through a factsheet and on our website which sets out what asbestos is, how we manage it and what they should do if they have concerns. Whilst this is generic information, specific advice and support will be given to any tenant where asbestos is suspected or found in a home. Whilst managing the health and safety of the situation is the most important aspect of our service, we will be emphatic to those who may be worried.

11 Electrical Safety

This policy sets out SLH's responsibilities to comply with relevant statutory regulations and non-statutory guidance for electrical installations in the properties we own and manage. We have strong procedures to underpin the policy to ensure the objectives are met.

11.1 Periodic Inspection

We will complete a periodic inspection of all tenanted properties at an interval not exceeding five years. The Electrical Installation Condition Report (EICR) will include the following information:

- Property address and current resident
- Date of inspection
- Schedule of items inspected
- Schedule of test results
- Any defects or departures from current edition of BS 7671
- Any remedial action taken
- A summary of the outcome of the inspection in terms of whether the installation is safe for continued use

11.2 Corrective Actions

Any immediately dangerous defects (e.g. C1) must be rectified, or appropriate action taken at the time of inspection to remove the danger. Potentially dangerous defects (e.g. C2 or F/I) should be rectified as soon as practicable.

11.3 Maintaining Records

SLH will retain the two most recent EICRs. SLH will appoint a third-party specialist contractor to complete quality control checks to provide assurance on the validity of electrical documentation in line with statutory legislation and non-statutory guidance.

SLH use a compliance document management system (TCW) to audit all EICR certificates. This system has been specifically designed for landlords to gather, analyse and manage their compliance documents.

12 Water Hygiene

SLH accept that the legionella bacteria may occur within water systems under its control in both its commercial properties and its housing stock and shall implement all necessary measures to minimise this risk from occurring by adopting a policy of installing low risk water systems in its properties wherever

possible and implementing rigorous monitoring and maintenance regimes in accordance with regulation and the Health and Safety Executive (HSE) Approved Code of Practice L8 - Legionnaires' Disease - The control of legionella bacteria in water systems (ACOP L8) .

SLH take our water hygiene safety responsibilities and duties seriously and commit to working within the Management of Health and Safety at Work Regulations, The Control of Substances Hazardous to Health Regulations (COSHH) and all related legislative and regulatory requirements.

12.1 Properties at Risk

- Two Retirement Living schemes
- Two blocks of shared owners and leaseholders with communal water system
- Two primary workplaces including the Headquarters office and one warehouse buildings
- Three rented commercial properties
- A community hub building
- One small housing property let to another organisations (supported living agency)

12.2 Legislation

The principal statutory requirements for the management and control of legionella is the HSE Approved Code of Practice and Guidance L8. The purpose of the regulation is to manage the risk from legionella to colleagues, tenants and visitors to any of the properties which SLH own or manage. To achieve the requirements within the ACOP, SLH will:

- Nominate a 'Responsible Person'
- Set out, in a clear and precise manner procedures for managing Legionella and the risk from Legionnaires' disease within our premises as part of its duties under the Health & Safety at Work Act 1974 and all associated regulatory requirements
- Apply robust controls and implement a programme of ongoing tests, inspections and maintenance to reduce the risk of potential Legionellosis within our property portfolio

12.3 Responsible Person

Both responsible persons are P901 qualified under Legionella Management Control of building hot and cold water services. The responsible persons will work in conjunction with the Approved Specialist Contractors to carry out risk assessments to establish the following:

- The presence of legionella through sample testing
- Assess conditions that are present that could increase the risk of bacteria
- Consider risk to colleagues, tenants and visitors to any premises which SLH own or manage
- Monitor and record outlet temperature

The Responsible Persons will ensure that the risk assessment process is repeated at a maximum interval of every two years or if there are significant changes to water systems or their use. The responsible persons will use the risk assessment in order to control the risks identified to ensure they:

- Prevent the growth of legionella bacteria
- Operate control measures to treat water in systems
- Ensure the correct use of and maintenance of systems

The responsible persons will complete an annual audit of the control measures to assess the effectiveness and competence of the Specialist Appointed Contractors to ensure that they are adhering to the Approved Code of Practice L8 and the related regulations.

12.4 Specialist Contractors

SLH will employ a Specialist Contractor to carry out periodic inspections and monitoring of water systems in accordance with the requirements set out within the risk assessments.

The Specialist Contractor in conjunction with the Competent Persons will implement any control measures required in order to mitigate the risk of Legionella and will supply SLH with recommendations for remedial works identified during the periodic inspection.

The Specialist Contractor will carry out an annual internal review of their own operations and will provide an annual report to the Competent Persons within SLH in order to ensure continued compliance set out within the Approved Code of Practice L8.

13 Lift Safety

This policy sets out SLH's responsibilities to comply with Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) (Regulation 9) where all duty holders providing lifting equipment and lifting accessories for use at work must ensure that it's inspected up to a standard so that it does not deteriorate to an unsafe condition and result in accidents.

SLH has four communal areas with lifts installed, all of which are passenger lifts. All passenger lifts will have a LOLER examination every six months. SLH will ensure that LOLER inspections are carried out by an independent organisation (i.e. independent from the lift servicing contractor).

In addition to this our lift servicing contractor carry out bi-monthly servicing of communal passenger lifts.

SLH complete six monthly servicing of stair lifts, hoists and through floor lifts installed in domestic properties.

If SLH discovers that a lift is faulty or in need of a repair, they will rectify if practicable to do so or will make safe which can include isolating a lift. A follow up appointment will be made by the engineer.

14 Customer Standards & Performance Monitoring

SLH will monitor and measure performance on all aspects of compliance management through a comprehensive set of monitoring actions:

- 100% compliance with all areas of this policy
- Maintain written/electronic records of all compliance checks and risk assessments.
- Ensure that all remedial and corrective actions are completed in target
- Ensure that the policy/procedures cover all persons likely to be at risk and include tenants/visitors, staff and contractors.

A monthly performance report will be reviewed by the Executive Leadership Team and quarterly by Audit & Risk Committee & Board.

15 Policy Review Considerations

This Policy will be reviewed by SLH every three years or more frequently if there are legislative or regulatory changes.

16 Equality Analysis

An Equality Analysis (EA) was carried out in conjunction with our tenants and this identified that careful considerations must be taken to ensure clear communication and awareness.

17 Policy Assessment

A policy assessment has been completed with SLH's risk map updated. Risks relating to the compliance areas are considered in line with the Risk Management Framework.

18 Customer Influence

Tenants were asked about their awareness, which will inform future communication with them of the content of this policy and its desired output. All complaints relating to compliance and / or health & safety issues will be reported quarterly to Audit & Risk Committee.

19 Statutory and Legislative Framework

The key statutory instruments and guidance relating to this policy are:

- The Control of Substances Hazardous to Health (COSHH) Regulations 2002
- The Management of Health and Safety at Work Regulations 1999
- The Health & Safety at Work (etc.) Act 1974
- The Environmental Protection Act 1990
- The Control of Asbestos Regulations 2012.
- The Hazardous Waste (England and Wales) (Amendment) Regulations 2016
- The Workplace (Health, Safety and welfare) Regulations 1992
- The Fire Safety Act 2021
- Lifts Regulations 2016
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR)
- Approved Code of Practice L8 – Legionnaires' disease. The control of legionella bacteria in water systems.
- HSG274 – Legionnaires' disease. Technical Guidance.
- HSG264 – Asbestos The Survey Guide.
- The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2007

- The Fire Safety (England) Regulations 2022
- Regulatory Reform (Fire Safety) order 2005
- The Construction (Design and Management) Regulations 2015
- Building Regulations 2010
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) (Regulation 9)
- The Personal Protective Equipment at Work Regulations 1992
- Approved Code of Practice L143 2012 “Managing and working with asbestos”.

20 Links to other SLH policies & Procedures

- Repairs & Maintenance Policy
- Chargeable Repairs Policy
- Customer Feedback Policy
- New & Disposed Home Proforma
- Legionella Management Procedure
- Asbestos Management Procedure
- Lift Safety Procedure
- Empty Homes Policy
- Health, Safety & Wellbeing Policy
- Tenancy Management Policy
- Gas Safety Procedure
- Electrical Safety Procedure
- Compliance Access Procedure
- Fire Safety Management Procedure