



Item C3

Key Housing

Tenant Safety Policy

First approved: May 2024
Revised: 10/25

Tenant Safety Policies – Key Housing Association

This policy statement brings together existing and new policies, within the Landlord function of Key Housing Association, which directly impact on Tenant Safety.

Ensuring tenant safety is the responsibility of all members of the Housing Services team. This responsibility includes:

- Adhering to the timescales for servicing and inspection of equipment – both legal and risk identified timescales
- Inspections of component parts and properties
- identifying risks and repairs whilst out and about
- awareness of the potential tenant safety issues and proactively reporting any concerns
- Providing information and advice to tenants on safety issues
- Providing information to contractors who work in our properties
- Providing guidance and advice to support staff about tenant safety issues
- Competence and/or awareness of the Health and Safety issues as detailed in the following policies.

Specifically, these policy statements cover the areas

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Asbestos Management

Responsible persons - Property Maintenance Team Manager & Property Maintenance Officers - identify and manage any asbestos

Maintenance Admin Team Manager and Maintenance Admin Assistants – in relation to information management

Training – Property Maintenance Team Manager & Property Maintenance Officers will attend asbestos awareness training courses. Training courses to be redone every three years or when there is significant legislation change.

Evidence of Compliance and Reporting – Asbestos Register in place and reviewed regularly to ensure all asbestos tests and risk of asbestos/proof of no asbestos recorded on register.

Internal Audit: Duty of Care Audit

Tenant Communication: Asbestos leaflet on website/issued to tenants

Related policies and guidance: Void inspection guidance (Minimum Letting Standard, Tenant Alteration and Improvement guidance, Procurement & Planned Replacement, CDM regulations and requirements

Last reviewed: 2019, May 2024

Key Housing Association

Asbestos Management

Introduction

Key is committed to providing as safe an environment for all tenants, visitors and contractors, within the individual properties and in common areas or the immediate environs of its properties, as is practical.

This duty of care is in compliance with the Control of Asbestos Regulations 2012.

The purpose of this policy is to

- Effectively manage all asbestos containing materials across the property portfolio and to reduce the asbestos related risks to as low a level as is reasonably practicable.
- Ensure that, as far as is reasonably practicable, no persons are exposed to risks to their health due to exposure to any asbestos containing materials that may be present in any of the properties it owns or occupies.
- Ensure that the Association complies with appropriate legislation.
- Establish clear guidelines to be adopted whenever asbestos is encountered in premises owned by or occupied by the Association.
- State the Association's policy that asbestos will not be removed where, following detailed assessment, it is proved to be not in a hazardous condition and will not be damaged or otherwise exposed, nor will it affect future maintenance plans or activities.

Definition

Asbestos is a natural fibrous mineral which was historically used as an insulation material and as a reinforcing material in composite building components and can be present within existing buildings.

Asbestos is a carcinogenic material if it is breathed into the lungs in sufficient quantity. The effects of Asbestos are long term (typically 25 -35 years after sufficient ingestion) and the diseases are life threatening. The use of Asbestos was banned in 2000. The presence of asbestos containing materials (ACMs) does not in itself represent a danger. However, asbestos is potentially hazardous when damaged or disturbed and must be treated accordingly. Activities which give rise to airborne dusts e.g. breaking, sawing, cutting, and drilling asbestos containing materials are the most likely to present risks.

Other Legislation regarding Asbestos including control of Asbestos Regulations 2012

The main relevant pieces of legislation in the UK are:

- **The Asbestos (Licensing) Regulation 1983** which prohibits work with asbestos insulation or coating of greater than 2 hours duration without a licence issued by the Health and Safety Executive.
- **The Control of Asbestos at Work Regulation 1987** require that an employee's exposure to asbestos be prevented or reduced as far as is reasonably practicable and that any risks are assessed before work with asbestos is started. The regulations also establish control limits for exposure. The legislation is supported by two Approved Codes of Practice.
- **The Health and Safety at Work Act 1974** which imposes general duties on employers to ensure the health, safety and welfare of employees and others who may be affected by an organisation's undertakings.
- **The Management of Health and Safety at Work Regulations 1992** which require employers to assess the risks to the health and safety of employees and others at work.
- **The Construction (Design and Management) Regulations 1994** which place duties on clients, planning supervisors, principal contractors, designers and contractors to plan, coordinate and manage health and safety on construction work if the work will last in excess of 30 days or involves five or more people on site at any one time. The regulations specifically require the client to provide relevant health and safety information to the planning supervisor appointed to oversee the project. This information might include, for example, previous surveys of buildings etc. for asbestos.
- **The Construction (Design and Management) Regulations 2015** which generally place greater responsibility on the client. The Association now appoints a Principal Designer (where appropriate) and the principal contractor following an assessment of competency and resources and must ensure adequate plans and welfare are in place before construction begins.
- **The Control of Asbestos at Work Regulations 2002 (CAWR)** which places a legal duty on the 'Duty Holder' to manage asbestos in non-domestic premises. It is likely that this legislation will be extended in the future to include domestic dwellings.
- The CAWR legislation applies to the following non-domestic properties owned by the Association:
 - The Square, 70 Renton Street

- Kerr Street – managed on behalf of Community Lifestyles
 - Common areas of blocks of flats (internal and external)
 - Gardens, yards and outhouses
- **The Control of Asbestos Regulations 2012** introduced a more stringent control limit, alter the licensing requirements, in particular exempting textured decorative coatings from licensing, and placing more onerous training requirements on employers whose employees might be exposed to asbestos. The Association continues to remove textured coatings where appropriate, but these regulations no longer require a licensed contractor to undertake the sampling.

Key's asbestos management policy includes the following measures:

- Assessment and selective testing of building components in and around all our properties
- Maintenance of records of any Asbestos-Containing Material (ACM) containing materials in an easily accessed location- on paper, scanned into K drive and recorded on database
- Use of these records to inform all affected persons (tenants and contractors) of the presence of ACMs, any limitations to any activity in and around the home.
- An agreed protocol and procedure for the removal of any ACM, circumstances permitting.
- Actively promoting this and other policies, along with additional guidance and advice where available.

Action Plan

- Key has undertaken visual inspections of all building components in and around its properties. These have been undertaken by our Property Maintenance Officers (who have had suitable Asbestos Awareness Training), during their normal course of duties. Any materials suspected of containing Asbestos are sampled and tested, with appropriate recording and action taken.
- Key also carries out fully invasive asbestos surveys during any contract which may involve the presence of ACMs. These include the entirety of our remodelling programme and planned repairs programme. Again, appropriate recording and actions are taken.

- Key continues to inspect all properties on a regular basis and any suspected ACM discovered, particularly those items applied, fitted or imported by tenants (such as textured wall coatings) will be sampled and tested.

Key maintains a record of information on any properties with ACMs which forms our Asbestos Register.

Existing tenants have been informed of the presence of ACMs in their home where these are present (currently confined to minor quantities of Chrysotile in textured, decorative coatings to ceilings). These tenants have been informed of the need to seek advice and guidance before undertaking any works in and around ceilings that may disturb the encapsulation of fibres.

All contractors carrying out work, in and around any property with ACMs, that is likely to disturb the ACMs, will be informed of the nature of the asbestos, the make-up of the material, the exact locations, the current encapsulation and the expectations of the contractor with regards to the Asbestos Regulations. Asbestos information will be contained within the Pre Contract Information for Planned work or in specification for individual pieces of work.

When properties become vacant which contains suitably encapsulated ACMs, Key will undertake the removal of all ACMs (including Clean Air Certification post works). Key will use contractors who are suitably licenced for this work.

If any property is found to contain friable or non-encapsulated asbestos fibres, then Key will immediately enter into an urgent procedure to have these materials removed and for decontamination to follow. The tenant/ occupants will be fully involved throughout this process.

Key HA will use its website, newsletters and other publications to inform and promote this policy and any other relevant guidance.

Electrical Systems and Safety

Responsible persons:

Property Maintenance Team Manager & Property Maintenance Officers to demonstrate Competence reviewing Electrical safety certificates and authorising/instructing work

Maintenance Admin Team Manager and Maintenance Admin Assistants to demonstrate Awareness of Electrical safety – Keeping of database and records, monitoring and ensuring electrical safety checks and Portable Appliance Testing is carried out within timescales by qualified contractors and issues raised for responses by Maintenance Officers – as above.

Tenancy Services team to demonstrate Awareness of importance of electrical safety – instructing electrical safety checks for all void properties and checking there is current certificate at the time a new tenancy starts.

Training – Property Maintenance Officers will have completed an electrical safety course before reviewing Electrical paperwork (EICR.) This training will be refreshed every 3 years or when there is significant legislation change.

Maintenance Admin assistants will complete an Electrical safety training module when taking up post and refresher training as required.

Evidence of Compliance and Reporting - Legal requirement for Electrical systems to be checked within 5-year period. Compliance reported to Scottish Housing Regulator in ARC (Annual Return on the Charter)

Internal Audit – Duty of Care

Tenant Communication – Fire Safety leaflet and newsletter articles where required

Review Dates: May 2024

Electrical Systems and Safety

Purpose

The aim of this Policy is to ensure the effective inspection, maintenance and management of all electrical installations, fixtures and appliances within premises controlled by the Association. All electrical repair work and Electrical Installation Condition Reports will be sub-contracted to an external competent body.

Relevant legislation & Standards

British Standard BS7671:2018

The Consumer Protection Act 1987

The Electrical Equipment (Safety) Regulations 1994

Definitions

“Competent Person” – person suitably trained and qualified by knowledge and practical experience, and provided with the necessary instructions, to enable the required task(s) to be carried out correctly.

All Properties owned by Key or where Key has assumed maintenance responsibilities.

- The Association will ensure that all electrical installations, fixtures, fittings, and any electrical equipment provided, is safe, in a reasonable state of repair and in proper working order at the start of the tenancy and throughout its duration.
- Visual inspections on all electrical appliances will be carried out by a competent person before a tenant moves in and regularly throughout the tenancy
- The Association will ensure that service contractors carrying out Electrical Installation Condition Reports (EICR) are competent within the terms of the Regulations and are members of recognised professional bodies.
- The EICR will be carried out every five years, and at the start of a new tenancy. In Key owned Houses in Multiple Occupancy the EICR will be carried out every three years
- The EICR will be renewed before five-year anniversary date and maintenance admin will begin arranging new date 6 months before anniversary date.
- The Association will retain a copy of the Electrical Installation Condition Report for six years. A copy of the most recent report will be issued to the tenant before a tenancy starts. If an inspection is carried out during a tenancy, a copy relating to that inspection will also be given to the tenant.

Furnishings: Portable Appliance Testing (PAT)

Key Housing Association has many furnished tenancies with full or partial furnishings packages

We will take reasonable steps to ensure that all appliances (e.g. electric kettles, fridges, washing machines etc.) provided as part of the tenancy agreement are safe. (Each tenancy has an inventory which details the items covered by the package).

The appliances detailed will be tested yearly. Records will be kept and date of inspection and name of contractor recorded on database with associated reports for monitoring and control of the programme of PAT testing.

All portable appliances bought through the furnishings packages should have CE Mark, the British Standard Kitemark or the 'BEAB Approved' mark.

Repairs and Emergencies

Should any faulty equipment be observed, the Association will ask the tenant to take the item out of service until it is repaired or replaced.

The Association will use a competent service contractor to carry out repairs and emergency responses.

Tenant Responsibilities

Tenants will be issued with information on electrical safety via the Tenants Handbook and website. Tenants will be advised to report any electrical faults immediately. Tenants will be informed of any electrical items which may be prohibited due to health and safety concerns.

HMO's (Key Owned, Leased and where there is support presence only)

Key Housing Association will PAT test all appliances within Houses in Multiple Occupancies (HMO) whether owned, leased or where there is only a support service located.

Electrical Information records

The Association will hold centrally information relating to all electrical appliances. This information will detail

- Copy of Electrical installation check and any minor work/installation certificates
- Date of installation and/or last service of electrical installation
- Date of last service of portable appliance test
- The database will also generate colour coded reports to assist with monitoring and ensuring all checks and servicing are carried out within the legal timescales. This report is emailed daily to Maintenance Admin Team Manager to review.

Fire Safety

Including Smoke Detection, Sprinklers, Fire Fighting equipment, Fire Alarm Monitoring

Fire Safety Communal checks and Risk Assessments

Responsible persons: Property Maintenance Team Manager & Property Maintenance Officers to demonstrate competence reviewing fire safety certificates and authorising/instructing work.

Maintenance Admin Team Manager and Maintenance Admin assistants -Keeping of database and records, monitoring and ensuring safety checks and replacements are carried out within timescales by qualified contractors and issues raised for responses by Maintenance Officers – as above.

Tenancy Services team to demonstrate awareness on importance of fire safety – instructing smoke detector safety checks for all void properties and checking there is current certificate at the time a new tenancy starts.

Training – Property Maintenance Officers and Housing Officers to complete HMO training – including fire safety training

Any relevant training and seminars – sector specific and general. Online training modules about fire safety.

Evidence of Compliance and Reporting – Annual Return on the Charter/Scottish Housing Quality Standard

Audit: Duty of Care

Tenant Communication: “ Keeping You and Your Home Safe: Fire Advice leaflet” available on website.

Other relevant policies: Repairs and maintenance policy

Last reviewed : May 2024

Fire Safety

Purpose

The aim of this policy is to provide a robust fire safety framework which can be implemented to secure the safety and wellbeing of tenants, visitors and firefighters.

The procedures detailed within this section are intended to facilitate the effective management of fire safety, ensuring that all reasonable steps are taken to comply with the Fire (Scotland) Act 2005, the Fire Safety (Scotland) Regulations 2006 and all other relevant legislation.

Definitions

Common Area – “A common area is a portion of a property that is shared and used by multiple residents. This would include areas such as the lobby, stairway and hallway.

Compartmentation – “subdivision of a building by fire-resisting walls and/or floors for the purpose of limiting fire spread within the building.”

Competent Person – “person, suitably trained and qualified by knowledge and practical experience, and provided with the necessary instructions, to enable the required task(s) to be carried out correctly.”

Dwelling – “a house, flat, or other place of residence.”

Emergency Lighting – “lighting provided for use when the supply to normal lighting fails.”

Fire Door – “door or shutter provided for the passage of people, air or objects which, together with its frame and furniture as installed in a building, is intended (when closed) to resist the passage of fire and/or gaseous products of combustion and is capable of meeting specified performance criteria to those ends.”

Smoke Alarm – “device containing, within one housing, all the components, necessary for detecting smoke and for giving an audible alarm.”

Sprinkler System – “a system comprising thermos-sensitive devices designed to react at a pre-determined temperature to automatically release a stream of water and distribute it in a specified pattern and quantity over a designated area.” HMO – “a house, premises or a group of premises with shared amenities, occupied by three or more persons from three or more families as their only or main residence.”

References

- BS 5839-6:2019+A1:2020
- Building (Scotland) Regulations 2004
- Domestic Technical Handbook (as revised)
- Electrical Equipment (Safety) Regulations 1994
- Fire (Scotland) Act 2005
- Fire Safety (Scotland) Regulations 2006
- Furniture and Furnishings (Fire) (Safety) Regulations 1988
- Gas Safety (Installation and Use) Regulations 1998
- Health and Safety (Safety Signs and Signals) Regulations 1996
- Health and Safety at Work etc. Act 1974
- Scottish Government Practical Fire Safety Guidance for Existing High-Rise

Domestic Buildings

Fire and Smoke Alarms

The Association will provide:

- one smoke alarm in the room which is frequently used by the occupants for general daytime living purposes
- one smoke alarm in each bedroom
- one smoke alarm in every circulation space, such as hallways and landings
- one heat alarm in every kitchen.
- One Carbon monoxide alarm in proximity to a gas appliance will comply with British Kitemark EN 50291-1:2018.

All alarms will be interlinked, mains powered and provided with an integral stand-by back up battery power supply. This standard is an enhanced LD2 standard (LD2 standard has been required to be fitted in all residential property as of February 2022). Additional smoke detection alarms will be fitted where there is additional risk identified e.g. closes.

Where needed, specialised alarms will be given to tenants who have a disability, an impairment or special needs (e.g. smoke alarms with a vibrating pad, flashing light etc.). These will be linked to the existing smoke detection and fire alarm monitoring unit.

Details of all smoke detectors, model and expiry date will be logged on the database. Smoke alarms fitted have a 10-year life expectancy, but we will start replacing them at 9 years.

The Association will ensure that fire and smoke alarms are in proper working order at the start of each tenancy. These will be serviced alongside the EICR, and PAT testing of any furnishings package items in the vacant property.

All fire and smoke alarms will be serviced once every two years.

Tenant advice

Tenants will be advised to test alarms on a weekly basis. Additional Fire safety advice is included in “Keeping You and Your Home Safe: Fire Advice leaflet” which was issued to all existing tenants and all new tenants, and available on our website.

All Key support staff are requested to assist tenants to test their smoke alarms weekly.

Smoke Detection Servicing & Telecare and record keeping

The Association will hold information relating to all smoke detection. This information will detail:

- Model and make of smoke/heat detector, installation date and expiry date
- Date of installation and/or last service of smoke detection system
- Date of last service of interlinked smoke detection system
- The database will also generate colour coded reports to assist with monitoring and ensuring all checks and servicing are carried out within the legal timescales. This report is emailed daily to Maintenance Admin Team Manager to review.

Fire Alarm Monitoring

Key Housing Association has taken the decision to further enhance the safety of its tenants and properties by fitting a fire alarm monitoring unit to monitor activations of the smoke detection within tenants’ homes. At the present time this is a Tunstall Lifeline Digital (mobile telephony) which upon activation of the smoke detection and/or sprinklers if in place calls Bield Response 24. Individualised protocols are in place for each tenant in the event of an activation.

Any existing tenants who have a monitoring unit which relies on landline will be upgraded to a digital unit prior to landline switch off in January 2027. Tenants currently with landline units may have a mixture of personal alert and smoke detection, personal alert is being dismantled, and key will provide smoke detection monitoring only. Personal care/alert telecare is to become the responsibility of the relevant local authority.

Faults with fire monitoring units are phoned through by tenants or support staff to maintenance admin, (mobile telephony units have a portal which provides regular updates on health of units) Specialist contractors and instructions are issued to resolve such issues.

Interlinked fire monitoring units are checked alongside the servicing of smoke and fire detection.

Key Housing Association records make, model, installation date of all fire monitoring units and any related peripherals or specialist kit it has fitted or is aware of.

Emergency Lighting

For blocks of flats and maisonettes, emergency lighting will be present in all communal areas and common escape routes. Where the emergency lighting provision is under the control of a third party (e.g. Local Authority), all reasonable steps will be taken to communicate with the third party in an attempt to ensure compliance with the procedures below.

The emergency lighting system will be designed to automatically illuminate upon the failure of the power supply.

A six-monthly discharge test will be performed by an electrician. This will involve simulating a power failure and conducting a test of the full rated duration of the emergency lights (Key: 1 hour discharge test in common closes) HMO's – internal and in communal areas adjacent 3 hours discharge test)

Emergency Lighting – records

All emergency lighting is recorded on the database alongside details of the make, model and date of last service.

Fire Doors and Compartmentation

Buildings containing flats and maisonettes will be split into fire-resisting compartments by fire-resisting doors, walls and floors which will provide a physical barrier to fire.

Doors connecting shared parts of a multi-occupancy dwelling, such as the doors to individual flats or apartments will be rated fire doors.

For homes with an integral garage, the door that joins the garage to the main part of the house will be a fire door.

Doors used for plant rooms and service penetrations such as rubbish chutes will be fire rated.

Emergency Exit Doors

The Association will ensure all doors which are to be used in an emergency can be opened from the inside without the use of a key.

Smoke Ventilation

Communal areas will have adequate smoke ventilation either through natural means or by mechanical ventilation.

Any ventilation ducts supplying or removing air from a protected stairway or entrance hall will not serve any other areas.

All buildings will have adequate means for venting heat and smoke from a fire in the basement.

Fire Equipment: Sprinklers

Sprinklers will be installed where the Association is unable to reduce particular risks by other means.

Key Housing Association has fitted around 210 sprinklers within domestic properties as part of its remodelling and subdivision programme and where a particular risk has been identified. These are mainly mains fed but where pressure is too low a tank in the attic has been fitted. Mist based sprinkler systems will also be considered in future risk assessments.

Sprinkler systems are serviced each year by a competent contractor. Requesting of servicing and monitoring of progress will be carried out by the Maintenance admin section. Scanned copies of the servicing documents will be kept for a minimum of 6 years.

Sprinkler system records

Records are kept on the database of the original installer, dates of servicing and servicing contractor.

Monitoring reports from the database will be utilised to ensure servicing is done on time and the documentation is in place.

Fire Fighting Equipment

Fire extinguishers will not be installed in dwellings as tenants will not be trained on the safe use of extinguishers.

Fire Fighting Equipment will be installed in worker bases where it has been identified as required through Keys Health and Safety Team Fire Policy.

Fire Fighting Equipment will be fitted in our HMO (Key owned properties) to meet our legal responsibilities.

Fire Fighting Equipment Records

Where fitted, records of FFE will be kept on the database and the items will be serviced yearly. Dates of servicing and contractor name will be saved.

Furniture and Furnishings

Where furniture and furnishings are provided, the Association will ensure they are fully compliant with the Furniture and Furnishings (Fire Safety Regulations 1988). Reimbursement for furnishings will only be made if purchased from a recognised and registered businesses.

Access and Facilities for the Fire Service

The Association will ensure:

- There is sufficient means of external access to enable fire appliances to be brought near to the building for effective use
- There is sufficient means of access into, and within, the building for firefighting personnel to effect search and rescue and fight fire
- The building is provided with sufficient internal fire mains and other facilities to assist firefighters in their tasks.

Tenant Responsibilities

The Association will include fire safety obligations within tenancy agreements and will issue regular fire safety information to remind tenants to:

- Test smoke alarms on a weekly basis
- Ensure all communal areas are not obstructed
- Ensure fire doors are not propped open or otherwise disabled

Tenancy Agreements will specifically state that front doors cannot be changed without the express permission of the Association.

Licensed Houses of Multiple Occupancy (HMOs)

All policies listed above will be applied. In addition to these, all licenced HMOs and commercial premises managed by the Association:

- Will be fire risk assessed by a competent assessor, with periodicity determined by the fire risk assessment
- Will have doors opening in the direction of escape
- Will be supplied with appropriate, maintained extinguishers
- Will have the fire evacuation procedure details relayed to relevant persons

Fire Risk Assessments

The legal requirements relating to Fire Risk Assessing are complex and are often taken to exclude domestic premises. However, the Association has a legal duty to risk

assess all areas defined as 'workplaces', which will include plant rooms and other non-tenant-accessible areas.

Furthermore, the fire regulations require common areas to be maintained in a certain condition suitable for the fire authority, which can often only be ensured by carrying out a risk assessment. Still further, the deaths which occurred at Lakanal and Grenfell have brought into sharp focus the importance of risk assessing high rise buildings and, indeed, all housing 'blocks' (Key Housing Association has no buildings which are classified as "high rise")

The Association will arrange for the undertaking of fire risk assessments (and regular reviews) by competent persons.

The following will be considered in assessing fire risks:

- High rise buildings pose a particular risk to tenants and often exhibit significant uncontrolled risks.
- 'Workplaces' such as plant rooms come within the scope of the regulations so far as fire risk assessing is required.
- Worker bases and sleepovers are also within this scope (crossover with Health and Safety). Our worker bases and sleepovers Fire Policy is reviewed and maintained by our Health and Safety Team
- Common areas of domestic premises require to be maintained in a certain condition will be assessed annually by maintenance officers carrying out common fire safety inspections.
- Particular risks may be posed by external wall systems, e.g. cladding (recognising that specialised intrusive inspection and fire performance testing may be required in some circumstances).

Gas Safety

Responsible persons: Property Maintenance Team Manager & Property Maintenance Officers to demonstrate competence reviewing Gas safety certificates and authorising/instructing work

Maintenance Admin Team Manager and Maintenance Admin Assistants to demonstrate Awareness of Gas Safety – Keeping of database and records, monitoring and ensuring gas safety checks are carried out within timescales by qualified contractors.

Tenancy Services team to demonstrate Awareness of importance of gas safety – instructing gas safety checks for all void properties and checking there is current (within 6 months) certificate at the time a new tenancy starts.

Training – Property Maintenance Officers will have complete a Gas safety course before reviewing Gas Service paperwork (CP12) This training will be refreshed every 3 years or when there is significant legislative change.

Maintenance Admin Assistants will complete a Gas awareness training module when taking up post and refresher training as required.

Evidence of Compliance and Reporting

Legal requirement for Gas boilers to be serviced within 365 days.

Compliance reported to Scottish Housing Regulator in ARC (Annual Return on the Charter)

Quarterly compliance part of reporting to HDRG (Housing Development Review Group (meet 3 times per year)

Internal Audit – Duty of Care

Tenant Communication – regularly in newsletters, within letters requesting access for servicing

Related procedures : Repairs and Maintenance policy and procedure

Last reviewed : Formerly within Maintenance Policies, May 2024

Gas Safety Policy and Procedures in Key owned properties

Introduction

The aim of this Policy is to ensure the effective inspection, maintenance and management of gas systems within premises controlled by the Association. The gas safety system, inspection and monitoring programmes will also include the carbon monoxide monitoring systems which are considered to be an integral part of the gas safety management programme. This Policy aims to ensure that the gas appliances, fittings, fires and flues that the Association provides for tenants' use are maintained in a safe condition at all times.

It covers the following areas:

- The Association's Responsibilities
- The Contractor's Responsibilities
- The Competence of the Contractor
- The Gas Appliance Register
- Annual Safety Inspection
- The Association's Non-Access Procedures
- Gas Repairs
- New Developments
- Component Replacements
- Quality Control
- Responsibility

Relevant Legislation

Health and Safety at Work etc. Act 1974

Management of Health and Safety at Work Regulations 1999, as amended

Gas Safety (Installation and Use) Regulations 1998

Gas Safety (Management) Regulations 1996

Gas Industry Unsafe Situations Procedure 8th Edition

The Gas Safety (Installation and Use) Regulations 1998 came into force on 31st October 1998 and covers a wide range of issues connected with the installation and use of gas appliances.

Key Housing Association's specific responsibilities for its rented properties are as follows:

- Existing Properties - Complete a Landlord's Annual Gas Safety Record for the inspection of gas appliances, fittings and flues provided by the Association within each 12-month period or within 365 days of anniversary date.
- Supply and replace at appropriate intervals a carbon monoxide detector in each property in proximity to the gas appliance.

- New Properties- Complete a Landlord's Annual Gas Safety Record for the inspection of all gas appliances, fittings and flues provided by the Association in recently completed property within 12 months of practical completion.
- Before Occupation- Complete a Landlord's Annual Gas Safety Record before a tenant moves into a property.
- Information to Tenants - Provide a copy of the certificate to the tenants of inspected properties within 28 days of the safety check.
- Records -Keep all Certificates for a minimum of 2 years after the date of completion.
- Certified Contractor -Ensure that all work carried out on the Association's behalf to gas appliances, fittings or flues is carried out by a Registered Gas Installer or Registered Contractor.
- Make a copy of the certificate available for inspection by any lawful occupier of the inspected property at reasonable notice and provide a copy of the certificate to the tenant when it is issued.

The Health and Safety Executive appointed GAS SAFE on 1st April 2009 to manage and certify the registers of installers and contractors.

Contractors' responsibilities

The Contractors' responsibilities are primarily from the Gas Safety (Installation and Use) Regulations 1998 and the Association's current gas contract which state that:

- All engineers working on the Association's appliances are appointed by a contractor who has been appointed by the Association
- 24-hour cover is provided for the maintenance of the Association's gas appliances and flues
- A safety check and service on the Associations gas appliances is carried out within a 12-month period.
- The contractor must also ensure that a carbon monoxide detector (BS 50291 certified) is installed and is working satisfactorily when the annual safety check and service is being carried out.
- A safety check and servicing programme will be agreed by the contractor and made available to the Association at least two months prior to the first safety check and service
- Live reports are available on contractor portal/database. Including servicing and repairs reports. Daily electronic updates will be received during the safety check and servicing programme period. Details on the services completed, no access to property and planned dates for the outstanding appliances will be provided to the Association by the Contractor.
- The Contractor will provide gas safety certificates via contractor portal/database at time of CP12 completion. Job records will always be made available to the Association (e.g. electronically or direct access through a client portal)

- The Contractor is required to advise the Association immediately when an unsafe appliance is identified. The Contractor will apply a warning label the unsafe appliance. The label should not be removed until repairs are complete.
- When working on the Association's appliances the Contractor will at all times comply with legislation and amend practices and procedures in accordance with changing legislation.
- The Contractor will attend regular meetings with the Association as agreed.
- The Contractor will carry out a visual check on any gas appliances, fittings and flues provided by the tenant and will report on the condition of appliances to the tenant and the Association. Any unsafe appliance should have warning labels attached. The tenant will be advised that the labels should not be removed until repairs are complete. They will also be advised of the action that they should take to rectify the fault.

The Competence of the Contractor

Key Housing Association only approves competent contractors for the gas servicing contract or the installation of new appliances. In order that this objective can be achieved, all potential contractors will be required to undertake a rigorous tendering and contractor selection process. The contract will be procured in accordance with the Association's Procurement Policy. To ensure that the Association is satisfied that the gas contractor's operatives are competent, the Association will carry out the following checks:

- Check the Contractors' operatives GAS SAFE registration by obtaining a copy of their Gas Installers GAS SAFE registration card. This will be available via contractor portal/database. Copies of the engineer's registration cards will be held in a central file at the Association's Offices
- The Association will obtain written confirmation from the Contractor that no unregistered engineer will work on the Association's appliances
- The contractor method statements and procedures will be checked by a qualified third party appointed by the Association.

Gas Appliance Information

The Association will hold centrally information relating to all of its gas appliances. This information will detail:

- A description of the appliance(s) including make and model
- Date of installation and/or last service
- Servicing history
- The database will also generate colour coded reports to assist with monitoring and ensuring all checks and servicing are carried out within the legal timescales. This report is emailed daily to Maintenance Admin Team Manager to review.

Annual Gas Safety Inspections

The Association will take the following steps to ensure that annual inspections can be carried out on all appliances within a 365-day period:

- The contractor will agree with the Association a programme of inspection and servicing at least 8 weeks before the first service is due. In cases where the tenant has historically presented difficulties in obtaining access for gas servicing, efforts to gain access will commence earlier. A record of these tenants will be kept, and initial access will be arranged through the Maintenance admin or Housing.
- A servicing timetable for the contract is agreed and managed by the Association for the duration of the contract. At present this is agreed as part of the 3-year contract.
- The first visit is scheduled to take place 2 months prior to expiry of certificate. The Contractor will contact the tenant directly in writing and leave a postcard if the visit is unsuccessful, and advise the Association, who will then commence the “No Access” procedure. The Association will contact the tenant in writing by means of the letter(s) detailed in the no access procedures. These letters emphasise the legal requirement to permit access and the safety reasons for doing so. The contractor may make evening or weekend appointments available at the contractor’s discretion.
- The contractor and the Association will retain records of all communication with the tenant as these may be required to demonstrate all reasonable efforts have been made prior to seeking legal measures to force access (see no access procedure, below).
- A procedure for non-access is agreed with the Contractor.
- The Association may incur charges for forcing entry to undertake a service or to cap a supply having followed its access procedures. These charges may be recharged to the tenant.

Void Properties

The Association will instruct a Landlord’s Annual Gas Safety Record on all void properties, as set out in the Maintenance Policy and procedures.

Key Housing Association does not routinely cap void property gas supplies as most of our void properties are surrounded by occupied properties and a support worker presence. During the winter period we set the heating to come on if the internal temperature of the flat drops below 10 degrees and therefore preventing freezing and consequent flooding of the void property and others in the building. If it was felt that a void property was particularly vulnerable, we would take steps to disconnect and cap the gas supply.

If there has not been a gas service within 6 months of the new let date an additional full gas safety check will be carried out. A copy of the gas safety certificate will be

included in the tenancy sign up pack. Instruction on heating and gas safety advice is given to all new tenants and support staff where needed through demonstrations of safe use of systems and in the Tenant's Handbook.

Non-Access steps and procedures to meet Statutory timescales

The contractor operates an electronic portal which allows the Association to access live time information on all activities.

In relation to the first visit the tenant will be informed in writing, a minimum of 7 days in advance by the contractor.

If access was not obtained, or the service had to be aborted then a second visit will be arranged by the servicing contractor.

The Contractors portal is accessed each day for a live update on all imminent service dates.

If the second visit results in a non-access, it becomes necessary to involve all parties to arrange a further visit as soon as possible in order to prevent the 3rd letter stage/ forced entry possibility. Maintenance Admin will inform the relevant Housing Officer and/or support staff who may assist with a robust access date.

As forced entry is an absolute last resort, efforts will be intensified by all, to ensure that access can be agreed before it's necessary to issue the 3rd letter.

If no confirmed access can be agreed, then the Housing Officer will issue the 3rd letter (GSL 3) giving a date and time (with 7 days advance notice) where forced entry will take place. Before the 3rd visit the following safeguards must be actioned/ confirmed and recorded.

- Sufficient contact has been made with the tenant or advocates – including hand delivered letters and visits at different times of the day by a Housing or Maintenance Officer
- Risk assessed a forced entry
- Confirmed the tenant has an SST tenancy agreement
- Received authorisation from the Housing Services Manager to proceed

In certain circumstances where forced entry is being deferred, but any further delay would result in a breach of the statutory obligation, consideration should be given to disconnecting the gas supply to the property. This option would be taken at 3rd letter stage, and the correspondence/ contact would reflect this option. Cognisance of the tenant's personal circumstances must be acknowledged before this action is taken.

At the time of the 3rd visit (with the possibility of forced entry), the service engineer, the housing officer, one other Key employee (possibly the maintenance officer) and the joiner will gather at the property. If no response or entry is granted then, unless there are extenuating circumstances, forced entry will take place.

The service will take place witnessed by the housing officer and other Key personnel. Following forced entry if the gas/electric meters are in debt and therefore preventing the service being undertaken, the meter will be disconnected by the Association to prevent further use of the gas supply until a service takes place. Following the service the door will be repaired, any new keys left at a secure location and clear notification that a forced entry took place and the whereabouts of replacement keys firmly attached to the entrance door. The tenant will be recharged for all costs.

Gas Repairs

As well as carrying out annual servicing to gas appliances and raising landlord's gas safety records the Association, through an appointed contractor, will provide a full reactive repairs and emergency response service. Tenants will be made aware of the gas company's services and contact details at the start of the tenancy and regularly through newsletters, letters and the website.

A daily report on all jobs undertaken will be submitted to the Association and the details will be logged onto the repairs history for that property for record purposes.

The Association must ensure that any outstanding problems highlighted on the job sheet are followed, where applicable, examined including:

- The effectiveness of any flue;
- The supply of combustion air;
- It's operating pressure and heat input;
- It's operation so as to ensure its safe functioning.
- Where the contractor has been unable to obtain access to undertake necessary repair work the contractor must bring the situation to the attention of the Association. The Association will ensure that the tenant is contacted as quickly as the situation demands.

Tenant Responsibilities

- Gas safety obligations and duties will be clearly set out within Tenancy Agreements
- Tenants should report any gas repairs as directed by the Association, and different arrangements may apply for within and out with office hours.
- Report any suspected gas leaks immediately to Scottish Gas Network and the association.

Gas escapes

The gas service contractor will visit properties, (following any attendance by Scotland Gas Networks, if applicable) to assess the problem and repair any faults.

The Tenant's Handbook will include a section on Gas Safety and will advise a tenant to notify Scotland Gas Networks immediately of any suspected gas leak. Currently SGN have a statutory duty to attend gas escapes reported to them. Attendance will be made within 2 hours if a tenant has been able to turn off the gas supply using the emergency control valve on your meter. If a tenant has been unable to turn off the gas supply at the emergency control valve, SGN will attend within 1 hour. In the main, gas escapes are likely to occur within individual properties and tenants should in the first instance contact SGN Emergency Services.

Recognising that SGN will normally shut down the gas supply to an individual property where a leak is found and will not carry out any further works it is, recognised as good practice for the Association to follow up a report of a gas leak by instructing the gas contractor to attend.

Where repairs cannot be readily made and the heating system remains switched off the contractor will be asked to provide temporary heating and will advise the Association of the repair problem in order to agree remedial work. Only electrical heaters will be provided as a temporary source of heat. Tenants will be reimbursed for the cost of temporary heaters.

Monitoring Performance

Monitoring the performance of all gas engineers and contracts the Association will:

- Ensure that a 10% quality control on servicing and day to day repairs is carried out by the Contractor at the expense of the Contractor. Details of each inspection will be supplied to the Association on a quarterly basis.
- Set up a monitoring system to ensure that their 10% targets are being met. The monitoring system will include, as a minimum, timeous review of all servicing and repair certificates.
- Post inspections on work undertaken by gas contractors will be carried out by the Association's Maintenance Officers.
- In the event of a grievance arising from the monitoring process or where discrepancies and deficiencies are uncovered, the Association will require the contractor to instruct at the contractor's own cost, Gas Safe to carry out an investigation with all findings copied to the Association.
- Any further action against the contractor will be considered by the Board of Management, following a report from the Director of Property Services.

Lift Safety

Responsible persons: Property Maintenance Team Manager & Property Maintenance Officers to demonstrate Competence in regular inspections and instructing repairs identified.

Maintenance Admin Team Manager and Maintenance Admin Assistants -Keeping of database and records, monitoring and ensuring LOLER and service safety checks are carried out within timescales.

Training – where relevant training identified

Evidence of Compliance and Reporting - Compliance: Servicing and checking reports

Internal Audit – Duty of Care

Reviewed: May 2024

Key Housing Association: Lift Safety

Purpose

The aim of this Policy is to ensure the effective inspection, maintenance and management of all lifts controlled by the Association.

The procedures detailed within this section have been written to ensure all reasonable steps have been taken to comply with the Lifts Regulations 1997, Lifting Operations and Lifting Equipment Regulations (LOLER) 1998 and all other relevant legislation.

Relevant Legislation

The Equality Act 2010

Disability Discrimination Act 1995 and 2005

Health and Safety at Work Act etc.1974

Lifts Regulations 1997

Lifting Operations and Lifting Equipment Regulations (LOLER) 1998

Management of Health and Safety at Work Regulations 1999, as amended

Provision and use of Work Equipment Regulations 1998 (PUWER)

Scottish Housing Quality Standards (SHQS)

Supply of Machinery (Safety) Regulations 2008

The Testing and Assessment of Lifts 1998 LG1

Workplace (Health, Safety & Welfare) Regulations 1992 (as amended)

Definition of Lift

The Lifts Regulations 1997 define a 'lift' as: "a lifting appliance serving specific levels, having a car moving along rigid guides or a fixed course and inclined at an angle of more than 15 degrees to the horizontal, intended for the transport of: People, People and Goods or Goods alone if a person may enter without difficulty and fitted with controls inside the car or within reach of a person inside."

Installation of Lifts

The Association will ensure that all lifts are manufactured and installed in accordance with the Lifts Regulations 1997 and have a current Declaration of Conformity.

In specifying new lifts, stairlifts and escalators, awareness of users' special needs will be considered. In particular, attention will be given to the level of control buttons, sound controls, braille buttons and access for wheelchairs and walking aids. Where reasonably practicable, lifts will be fitted with emergency seats and with two-way communication systems for use in emergency situations. With regard to stairlifts, appropriate safety signs and instructions for use will be clearly displayed at each end of travel.

Stairlifts will only be considered where the installation of a passenger lift is not a viable option.

Periodic Inspection and Testing

The Association will ensure that all lifts are subject to a formal Inspection regime.

119 King Street, Stenhousemuir	Platform Lift	2 Months
100 Kerr Street, Glasgow	Platform Lift	3 Months
70 Renton Street, Glasgow	Platform Lift	6 Months
12 Hamilton Road, Rutherglen	Platform Lift	3 Months
10 Espedair Street, Paisley	Passenger Lift	6 Months

In addition, inspections will be organised after substantial and significant changes have been made or following "exceptional circumstances" such as damage to, failure of the lift and long periods out of use or a major change in operating conditions which is likely to affect the integrity of the equipment.

Inspections

A lift maintenance inspection covers structural integrity, the condition of safety devices, and the proper function of mechanical and electrical components, including doors, control systems, and support structures. The thorough examination assesses wear and tear, measures key components, and conducts operational tests to determine the continued safety of the equipment and ensure compliance with [LOLER](#) (Lifting Operations and Lifting Equipment Regulations).

Lift maintenance inspections will be carried out by an Independent Inspection Company. LOLER inspections will be carried out by the Associations insurer.

In addition to the formal inspection regime, onsite support staff will daily check platform lifts are operational, doors are secure, and lift buttons do not operate when doors are open. Any fault should be reported to maintenance immediately. Maintenance Admin Team Manager will request proof of daily checks every quarter.

Property Maintenance Officers will include routine safety checks of lifts to be carried out and recorded by the Association on a monthly basis.

These will be carried out from the safety of lift landings and will include:

- Ensuring the bottom of the doors run smoothly in their channels and grooves and when a moderate force is applied to the bottom of the door it is not deflected into the lift car and shaft
- ensuring the build-up of debris and grease in the channels is not adversely affecting safety
- ensuring the guide shoes on the bottom of the doors and channels and grooves are not damaged.

Should any lift be seen to be faulty, it will be immediately put out of use and the Association will arrange for any necessary corrective actions to be taken. Advice will be sought from a competent person where there is any doubt over safety. Records will be filed of all checks carried out, along with any documentation in relation to faults etc.

Routine Maintenance

The Association will engage suitably experienced and qualified companies to carry out routine maintenance on all lifts. This will include checking and replacing worn or damaged parts, lubrication, replacing time-expired components, topping up fluid levels, and making routine adjustments. This is to ensure the equipment continues to operate as intended, and risks associated with wear or deterioration are avoided.

Defects

If a defect is identified which is, or could become dangerous, the lift will be immediately made out of use. A repair will be carried out at the earliest possibility. The lift will not be useable until the defect has been satisfactorily remedied.

Minor defects reported which do not affect the primary function or the safety features of the lift will be actioned at the earliest possibility.

Documentation and Reporting

The Association will ensure a written and signed report is provided by the Independent Inspection Company within 28 days of the thorough Inspection being carried out.

Thorough Inspection reports will be retained for at least two years or until the next report is carried out, whichever is the later.

Stair Lifts

The Equality Act 2010 (the '2010 Act') requires the Organisation, in its capacity as a Registered Social Landlord ('RSL') to actively take steps to prevent discrimination which includes the duty to make 'reasonable adjustments' to premises.

If the installation of a stair lift is likely to require alteration to the fabric of the building, the necessary planning permission / building control will be sought.

All stair lifts will undergo routine maintenance, inspections and a 6-monthly thorough examination.

The Association will ensure that all new stair lifts are safe, supplied with instructions, have a Declaration of Conformity and the British Standard Kitemark or CE marking.

Emergency Equipment

All lifts will have a communication system which will include a telephone or a two-way voice system so that a person trapped inside can raise the alarm. All lifts will have adequate emergency lighting in the lift car.

Mould, Dampness and Condensation Policy & Procedures

Responsible persons – Property Maintenance Team Manager & Property Maintenance Officers

Maintenance Admin Team Manager and Maintenance Admin assistants

Tenancy Services Team

Training – SFHA training shared with whole Housing Services Team meeting

Evidence of Compliance and Reporting: Spreadsheet to record instances, actions and follow up. SHR ARC indicator

Audit: Duty of Care

Tenant Communication: Mould, Dampness and Condensation Leaflet

Last reviewed: September 2023, March 2024

Mould, Damp and Condensation Policy and Procedures

Purpose of this Policy

The aim of this policy is to proactively manage the potential risks and promptly diagnose and prevent issues which may arise from dampness and mould in our properties, including communal areas; committing to meeting the needs of our tenants and providing homes that are safe, warm, and dry.

Through this policy, we will establish appropriate processes, guidance, and knowledge to ensure all our properties are well maintained and free of dampness and mould that could risk the health and safety of tenants living in our homes.

Definitions

Rising Damp - The movement of moisture from the ground rising through the structure of the building through capillary action. This often resembles a tide mark along the wall.

Penetrating Damp - (including internal leaks) Water penetrating the external structure of the building or internal leaks causing damp, rot and damage to internal surfaces and structure. This will look like brown water marks.

Condensation Damp - Condensation occurs when moisture held in warm air meets a cold surface and then condenses producing water droplets. This can happen all year round but is more prevalent in the cold winter months.

The conditions that may increase the risk of condensation are:

- Lack of ventilation within the property. This can be from Extractor fans not working or windows not opened for ventilation.
- Inadequate heating. Room Thermostats should ideally be set to around 21/22 degrees to provide an adequate background warmth. This will help absorb moisture but still require ventilation.
- Inadequate loft insulation. Should this be discovered during an inspection, an instruction should be issued to rectify in line with SHQS.
- Insulation in general. Where there is little room to raise the thermal properties of the building, upgrades such as EWI, IWI or triple glazing could be considered.
- High humidity, Boiling water, showering, cooking and drying clothes can all add to the internal humidity

Legislation and Statutory/Regulatory Requirements

In developing this policy and procedure, recognition was taken of the legislative requirements and good practice set out in the following documents:

- Housing (Scotland) Act 2014.
- Health and Safety at Work Act etc. 1974.
- Scottish Housing Quality standards (SHQS)
 - Meet the Tolerable Standards.
 - Be free from serious disrepair.
 - Be energy efficient.
 - Have modern facilities and services.
 - Be healthy, safe, and secure.
- Energy Efficiency Standards in Social Housing (ESSH 1&2).

Responsibilities of Key Housing Association

- We will maintain a damp, condensation and mould register which will record any issues reported and actions taken. This will record all follow up visits to ensure action taken has cleared the issue.
- When any damp, condensation and mould is reported to us we will undertake a property inspection and investigate to determine the cause and carry out remedial repairs or give guidance in accordance with our policy and good practice.
- Inform the tenant of the findings of the investigations following the property visit. This will include identifying the possible causes, recommending effective solutions and all necessary remedial works or actions; keeping the tenant updated throughout the process from inspection to completion.
- Ensure that only contractors will be employed to carry out any works and that the customer's possessions are adequately protected during the works. Contractors must use specified products and methods.
- Ensure tenants homes are insulated in accordance with Scottish Quality Housing Standard / Energy Efficiency Standard for Social Housing (ESSH) to help reduce the likelihood of condensation occurring.
- Undertake reasonable improvement works required to assist in the management and control of condensation. This may include but is not limited to upgraded ventilation system installation, improving indoor air movement.
- Promote and provide general advice and guidance on how to minimise condensation, particularly when there are no apparent causes relating to design or construction. Guidance and advice pamphlet is available on the website.
- Ensure that all housing services employees have an awareness of the policy and receive adequate training to enable them to report issues of damp mould & condensation and to support our tenants.

- Relevant staff are trained and competent in the diagnosis of mould and dampness issues and in the provision of technical solutions to combat it

Assisting our Tenants

Where internal conditions within a home for example, overcrowding and excessive hoarding of personal belongs are influencing health and wellbeing of the occupants or are preventing inspections or repairs works being carried out, we will provide support and assistance. We will work with our support colleagues and/or external agencies to provide sensitive, practical assistance and support.

Where possible Key Housing Association will provide tenants with advice and assistance where a tenant is struggling to pay energy bills or there are issues with energy supply. We also recognise that some of our tenants may need help when it comes to meeting their repair responsibilities. We will help to provide practical solutions.

Procedures

Key Housing Association will respond to reports of dampness and mould promptly, with compassion for the impact on tenants' wellbeing, and with a focus on dealing with the issue and preventing it from reoccurring.

- Incidences of mould can be reported by tenants, support workers, or by Housing or Maintenance Officers who are visiting properties.
- Maintenance Officers service visits should identify any properties where they detect the presence of mould, and these properties should be revisited more frequently. This should be documented in the service visit paperwork.
- The aim will be to tackle the root cause of the problem. Staff or contractors sent in to respond to dampness and mould will be trained to identify the root cause, particularly whether any issues with the building are contributing e.g. defective or inadequate ventilation, leaks or water ingress, or insufficient/defective insulation.
- Once the root cause is identified staff or contractors will give advice on household practices to reduce the dampness and mould to tenants or request work orders to be issued for remedial works to be carried out.

To ensure that efforts to treat dampness and mould have worked properly:

- A follow-up visit to check whether the problem has truly been resolved should take place at least six weeks after the initial treatment, although any issues

reported by tenants in the meantime will be responded to promptly.

- A further follow up visit will be made by either a housing officer or maintenance officer in the next cold season to ensure that the problem has been rectified.
- All dampness and mould reports will be recorded centrally along with all advice or actions taken by staff and contractors and a record of follow up visit outcomes.
- The spreadsheet which records the incidences of mould will be reviewed in a meeting with both housing officers and maintenance officers on a quarterly basis to ensure that all reports are accurately recorded and followed up.

Servicing including Specialist Equipment – Domestic and HMO

Responsible persons:

Property Maintenance Team Manager & Property Maintenance Officers to demonstrate competence in inspections and instructing repairs identified.

Maintenance Admin Team Manager and Maintenance Admin Assistants – responsible to ensure servicing carried out within timescales and records kept in order.

Training – In house

Evidence of Compliance and Reporting: Duty of Care Audit sample testing

Audit: Duty of Care

Tenant Communication: Website, letters for access

Last reviewed: May 2024

Summary of all Servicing carried out by Key Housing Association

Servicing and inspection covered by Legislation	Interval	Policy with more details
Gas appliances	annually	Gas Safety
Fire Fighting Equipment (FFE)	annually	Fire Safety
Portable electrical appliances	annually	Electrical Safety
Fixed wire electrical checks (EICR)	Every 5 years Every 3 years in HMO's	Electrical safety
Sprinkler systems	annually	Fire Safety
Specialist Equipment	annually	Specialist Equipment
Hoists	6 monthly	Specialist Equipment Servicing
Lifts	Various – see Lift safety policy	Lift safety
Integrated fire alarms	Quarterly/ 6 monthly	Fire Safety Policy
Stairwell Emergency Lighting	6 monthly 1 hour testing	Fire Safety Policy
Emergency Lighting in HMO's – Internal and communal	6 monthly – 3 hours discharge	Fire Safety Policy
Key policy decisions on servicing		
Blender valves	Annually	Specialist Equipment Servicing
Mains Wired Smoke detectors (tenanted properties)	Every 2 years	Fire Safety Policy
Mains wired Smoke detectors in HMOs	Annually	Fire Safety Policy

Specialist Equipment: Servicing

Relevant Legislation

The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

Provision and use of work equipment regulations (PUWER)

Hoists

Key Housing Association service the hoists which they provide and own. These include portable, tracking and bathing hoists. These are checked and serviced every 6 months by a competent specialist contractor.

Specialist Beds

Beds containing moving parts and which have an electrical hospital style electric beds are serviced every six months.

Specialist Baths

Baths containing moving parts and which have an electrical power supply are serviced every six months.

These items above are also checked under our Insurance Policy.

Blender Valves – Thermostatic Mixing Valves

There is a risk of scalding where water comes out of taps at temperatures above 44°C.

The Association recognises we may have tenants who may not recognise high temperatures and respond quickly to scold.

Where vulnerable people can get access to baths or showers and the scalding risk is considered significant, a thermostatic mixing valve (TMV) Type 3 will be fitted to prevent water being discharged at more than 44°C.

These will be serviced annually.

Legionella Management Policy, Risk Assessment and Procedure

Duty responsible person – Helena Bruce Housing Services Manager and Gordon Anderson Director of Housing

Responsible persons - Property Maintenance Team Manager & Property Maintenance Officers - identify and manage any legionella

Maintenance Admin Team Manager and Maintenance Admin Assistants – in relation to information management

Training – Property Maintenance Team Manager & Property Maintenance Officers will attend legionella training courses; this will be reviewed every three years or when there is significant legislation change.

Evidence of Compliance and Reporting – Legionella risk assessments recorded and reviewed regularly

Internal Audit: Duty of Care Audit

Tenant Communication: Legionella leaflet on website/issued to tenants

Last reviewed: September 2023, June 2024, September 2025

For All Key Housing Association Domestic Properties. The aim of this policy is to ensure the effective management of all water systems within domestic properties owned by the association.

Key Housing Association is Owner / Landlord to 714 domestic properties.

Legal Duties

Key has several specific legal duties which relate to water safety and in particular, Legionella risk management. These include:

- Identifying and assessing sources of risk
- Preparing a scheme for preventing or controlling the risk
- Implementing and managing the scheme
- Keeping records and checking what has been done is effective

Legal Framework

Whilst this Policy sets out to explain Keys approach to reducing the risk of Legionella growth it must do so in the context of legal requirements. Therefore, the following relevant legislation has been considered in the development of this Policy:

- Control of Substances Hazardous to Health Regulations 2002, (as amended)
- L8 Legionnaires' Disease - The control of Legionella bacteria in water systems, Approved Code of Practice and Guidance (4th Edition)
- HSG274 Legionnaires' Disease – Technical Guidance (in 3 Parts) (2013)
- INDG458 Legionnaires' Disease – A brief guide for Duty Holders (2012)
- British Standard 8580:2010 - Water Quality: Risk Assessments for Legionella Control
- The Private Water Supply (Scotland) 2006
- The Water Supply (Water Fittings) (Scotland) Byelaws 2014
- The Water Supply (Water Quality) (Scotland) Regulations 2001

Legionella Information

Legionella – “a potentially dangerous type of bacteria when inhaled with water vapour. The bacterium grows best in warm, nutrient-rich water.”

Legionnaires' disease – “a potentially fatal form of pneumonia caused by the legionella bacteria.”

Legionella bacteria is common in natural water (such as rivers and ponds). However, legionella can grow in other water systems such as cooling towers, evaporative condensers, showers, spray apparatus and hot and cold-water systems.

Legionnaires' disease is a potentially fatal form of pneumonia caused by the inhalation of Legionella bacteria. The bacteria is normally contained within fine water droplets (aerosol).

Legionnaires' disease has the potential to affect anybody. However, those more susceptible are normally in the age range of 45 and above, smokers, heavy drinkers, or suffer from chronic respiratory or kidney disease or have impaired immune systems.

Legionellae survive low temperatures and thrive at temperatures between 20-45 degrees C if the conditions are right (e.g. if a supply of nutrients is present such as rust, sludge, scale and other bacteria).

Legionella Risk Management

Key will aim to minimise and control the risk from Legionnaires' disease and will:

- Appoint a responsible person who will have a duty to put in place an action plan to minimise the risk of Legionella and to manage and monitor the necessary work systems and procedures.
- Identify and assess sources of risk (e.g. where conditions are present that may encourage Legionella bacteria to multiply or where there is a means of creating and disseminating breathable droplets), and establish any items of non-compliance
- Assess the level of risk through a structured Legionella Risk Assessment programme, and aim to eliminate or reduce the risk to an acceptable level
- Arrange for routine inspection of water systems, and where needed, a programme of disinfection
- Retain records of maintenance, inspection and testing for a minimum of five years.

Risk Assessment

Key appointed qualified Legionella Risk Assessors to carry out risk assessment on all domestic properties, which was completed between 2023 to 2025 to identify and assess the risk of exposure to Legionella bacteria from all water systems across its properties.

All risk assessments have been completed by September 2025, some risk assessments involve the use of 'representative' assessments.

All recommendations and remedial action will be recorded in a logbook.

The risk assessment will be reviewed at regular intervals (at least every two years by appropriate maintenance officer) or when it is believed that the original risk

assessment is no longer valid (e.g. following a change in the building or water supply or following an incident).

Void Property Actions

It is recognised that all void properties have the potential to exhibit an increased risk of Legionella due to the possibility of stagnant water remaining undisturbed within pipework for prolonged periods.

To mitigate the increased potential risk associated with voids, an appointed contractor will carry out and record the following:

- Thoroughly flush all taps;
- Clean and disinfect, or replace, all shower heads;
- Inspect and report on water storage tank, where present.

Contractors

External contractors appointed to carry out legionella preventative monitoring and water hygiene services. As a minimum requirement are required to be a registered member of the Legionella Control Association (LCA) or the Water Management Society (WMSoc). Contracted works may include legionella sampling, tank inspections, water sampling, (for all bacteria) and other associated services, as identified in the Legionella Risk Assessment.

Notification Requirements

If it is suspected or confirmed that a tenant, employee, or visitor has contracted Legionnaires' disease, Key will report the incident to the HSE under the Reporting or Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR).

Tenant Responsibilities

Tenants will be provided with information on good water management and Legionella control means of information leaflets, website, and newsletters.

Tenants are advised to clean shower heads, descale, and disinfect them at least every two months. For showers that are only occasionally used, tenants are advised to flush the shower through by running the water for at least two minutes once a week.

Where a property is left vacant for any time (e.g., when on holiday), tenants are advised to flush both hot and cold-water systems by running all outlets for at least two minutes.

Tenants should inform the Key immediately if there are problems, debris, or discolouration in the water.

Review

Key will regularly review all guidance and good practices regarding the control of Legionella and the risks arising, taking any measures as determined to be reasonable.

Key will continue to review its properties and those components that contribute to the risk of Legionella infection and is committed to modifying or removing any factors within its control.

Legionella Risk Assessment For: All Key Housing Association Domestic Properties

Prepared by Helena Bruce for: Key Housing, The Square, 70 Renton St, Glasgow G4 0HT

Date of assessment 17/09/25

Date for Review – September 2026

Contents

1. Relevant Legislation
2. Risk Assessment and Conclusion
3. Action Plan.

2 - Risk Assessment

All Association properties have undergone a risk analysis with respect to the control of Legionella bacteria within domestic water supplies.

Cognisance of the type and design of systems was taken into consideration, as was the likelihood of exposure to aerosol spray, which could be ingested through breathing, from these systems.

The risk assessment concluded the following:

- A) All cold water storage systems in Key properties have a volume and stored temperature which falls between recognised safety parameters. The storage systems are of a domestic type and nature and are replenished with mains water continually.

Risk of the propagation of Legionella - Low

- B) All hot water storage systems within our properties are of a domestic nature (sub 300 litre capacity). The water is heated and maintained at a temperature exceeding 60centigrade (pasturisation temperature for Legionella). Stored water is replenished on a regular basis due to its low storage volume. Dead legs are of a minimum length and are regularly purged by the demand. Other than in 'off gas' geographical areas Key properties are fitted with gas fired combination boilers which utilise cold mains feeds and do not store any significant volume of heated water.

Risk of the propagation of Legionella - Low

- C) The Association do not fit group control valves for domestic hot water outlets. Any main hot water supply pipework is designed to minimal lengths and volumes, as are any dead legs.

Where water is required to be tempered for tenant safety, an individual blender valve is fitted within 2 metres of the outlet, fully in accordance with the water byelaws and the TMV regulations. These valves are serviced on an annual basis in accordance with the TMV2 regs.

Risk of the propagation of Legionella - Low

- D) Void or vacant properties may have stagnant water (hot and cold) which, while low in volume, may give rise to the possible propagation of bacteria, including Legionella. To combat this the association will carry out a flush of void properties two weeks prior to let. Including a thorough flush of all taps. Clean, disinfect or replace all shower heads and inspect and report on the water storage tank where present.

Risk of the propagation of Legionella - Medium

Conclusion

The domestic water supply systems in Key properties during occupancy do not provide the opportunity for Legionella bacteria to propagate and reach levels which would raise concern and give rise to the need for alternative measures.

Void or non-occupied properties (where a tenancy continues, but the tenant is absent) require specific control measures.

Overall risk rating –

A to C - Low

D - Medium

3 - Action plan

To further reduce the risk of stored water within Key properties being able to create a bacterial risk, including Legionella, through circumstances not in our control e.g. dramatic reduction in throughput of purging water etc, the association will continue to programme the replacement or reduction in size of any cold water storage facility in a Key property.

Key will introduce further safety measures with regard to void properties or properties that have been unoccupied for a period of time. These measures will be: The issue of

a guidance leaflet to all tenants regarding safe use of domestic water supplies following a period of unoccupancy.

The flush through of all domestic water supplies within a property no later than 2 weeks prior to relet.

Assessments and Review

Key Housing Association appointed external contractors to risk assess and record all domestic water supplies in our properties. Each property has been risk assessed between 2023 and 2025. Cold water storage tanks will be maintained and disinfected on a regular basis or removed. On a bi-annual basis the appointed maintenance officer will review the risk assessment and sign off that the information is still current. If it is not and there has been water supply alterations the Association will appoint an external contractor to carry out a new risk assessment.