

Landlord Compliance Policy Statement

2019 – 2022

Document control

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Updating	Landlord Compliance Policy Statement 2018 – 2019
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Author	Director of Assets
Responsible Executive Director	Executive Director – Property
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Version	Date	Author(s)	Notes on Revisions
1	April 18	Group Director of Assets & Head of Compliance	This is a new policy that has been created. It is an overarching compliance policy with compliance policies attached.
2	June 2019	Director of Assets	The Policy Statement have been updated to: <ul style="list-style-type: none"> • include non-core compliance areas • align with core compliance management plans • reflect correct officer job roles

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Risk Appetite

We are 100% committed towards compliance and has a set risk appetite Score of “five” - the lowest possible score. We aspire to be an exemplar performer in all areas of compliance.

Policy Statement

Livv Housing Group understands and is committed to maintaining a safe, healthy and sustainable environment. This environment is cultivated by working in a way that fully complies with The Health and Safety at Work Act 1974, the Home Standard and any further regulatory and statutory compliance standards. We are committed to meeting the standards set by external regulators and the high standards we set for ourselves as a responsible social landlord.

The emphasis of this Compliance Policy Statement is to set in place a positive culture of compliance. This will be characterised by communications based on mutual trust, a shared belief of the importance of exemplar service provision and by confidence in the efficiency of preventative measures.

Livv Housing Group aims to:

- Ensure compliance is at the forefront of all decision-making processes, to meet the Home Standard and be an exemplar landlord (in terms of compliance).
- Ensure transparency of performance in relation to all of the compliance areas throughout the organisation.
- Carry out annual self-assessments to ensure that we are meeting all regulatory expectations on behalf of our regulator, our customers and all other stakeholders.
- Continually improve and develop compliance management systems to manage, oversee and action all facets of landlord compliance operations.
- Foster a culture that actively encourages open reporting and seeks to learn from any failures. This will enable employees to accept and act upon their compliance responsibilities.
- Have a governance structure that is fit-for-purpose and leads to any potential improvement actions being implemented as required.
- Make clear to all parties the hierarchy of responsibility for each compliance area; empowering each person with the skills and knowledge to adequately fulfil the obligations of their role.

In order to achieve success, Livv Housing Group, Livv Homes, Livv Maintenance and First Ark Social Investment Fund (operating as Livv Investment) will, at the highest management level, promote a positive culture to ensure property compliance is an integral element of managing business operations. To share this vision, managers and staff at all levels will provide the necessary support to ensure Livv Housing Group’s compliance management system is fully implemented and regularly monitored.

The Livv Housing Group is responsible for the strategic direction of the organisations health and safety arrangements. Specifically, the Boards are responsible for:

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Being conversant with the requirements of statutory and regulatory bodies which govern the Group's business activities, e.g. Fire and Rescue Service, Health and Safety Executive (HSE), Environment Agency, Local Authority and Homes England/Regulator of Social Housing

- Demonstrating strong leadership and a positive culture on matters relating to health and safety
- Setting the Group's health and safety direction and expectations using a risk based approach
- Ensuring health and safety matters form an integral part of business operations
- Ensuring health and safety arrangements are adequately resourced and supported
- Ensuring annual budgetary decisions do not adversely affect health and safety arrangements
- Ensuring all significant business decisions affecting the health and safety of employees and customers reflect the commitments prescribed in this Policy

Overall and final accountability for Livv Housing Group's Landlord compliance sits with the Livv Housing Group Chief Executive, who is the named Accountable Person.

The Livv Housing Group Chief Executive has delegated compliance responsibility to the Executive Director of Property who will provide competent advice and support on all matters pertaining to the Home Standard, and other relevant regulatory and statutory standards. The Director of Assets has full responsibility for ensuring landlord compliance and that all property related statutory compliance is met.

Compliance Policies

A suite of compliance policies are appended to this document and outline how Livv Housing Group will meet all statutory and regulatory compliance obligations set for each area:

Appendix A – Gas & Carbon Monoxide Safety Management

Appendix B – Electrical Safety Management

Appendix C – Asbestos Control and Management

Appendix D – Fire Safety Management

Appendix E – Water Safety Management

Appendix F – Lifts and Lifting Equipment Safety Management

Appendix G – Non-Core compliance activities

A compliance management matrix (attached as Appendix H) details all core and non-core compliance activity to meet all statutory and regulatory obligations.

Associated policies and guidelines that should be read in conjunction with this policy:

- Incident Risk Management and Learning Framework (IRML); Fire Safety Policy; Home Standard; Health & Safety Policy; Health & Safety Strategy and Asset Management Strategy

All policies will be reviewed in line with our Policy Framework and legislative or regulatory changes. Livv Housing Group will also conduct annual audits of operational procedures and supporting resources

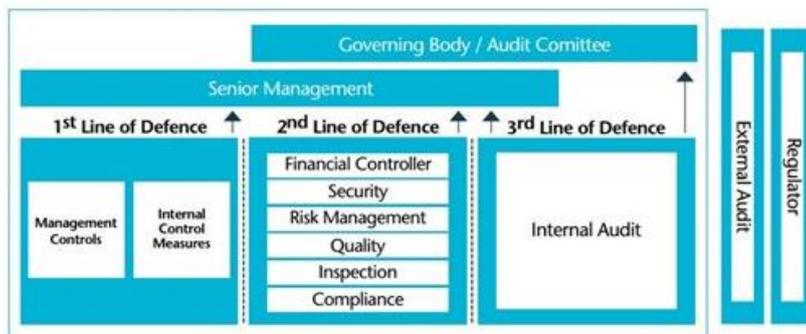
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which will be used to inform continuous improvement in this area. These audits may be completed internally or by external, independent third parties.

Monitoring – Three Lines of Defence



- **First Line of Defence** – Management reporting into Executive Director Team
- **Second Line of Defence** – Business Assurance audit
- **Third Line of Defence** – Internal audit

Corporate Assurance

Compliance internal audits are as set by Audit & Risk Committee.

All employees who become aware of any compliance concerns must follow the reporting process defined in the IRML Framework.

Corporate Reporting

The Compliance Manager will provide a detailed report regarding compliance to the Director of Assets on a weekly basis or as required. For each compliance area, the report will include:

- An explanation of the landlord duty
- How many properties/units/installations this applies to
- Target inspection volumes (or %) each month
- How many inspections/reviews fell due in the period - showing a rolling 12 month view
- What percentage of these were achieved
- What are the exceptions and what are the reasons for those exceptions
- What are the actions needing rectification to ensure compliance and an update of the status of these actions.

The Director of Assets will provide a detailed compliance report to the Executive Director of Property monthly, including a forecast as to the following month's service requirements and potential areas of slippage, or areas requiring wider Livv Housing Group assistance.

The Executive Director of Property will report compliance performance, highlighting all areas of non-compliance to the Chief Executive.

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The Chief Executive is the Accountable Person and will report to Board at every meeting with a detailed compliance report.

In addition, all major compliance deficiencies are to be reported on an exceptions basis to the Chair of the Board. As and when this occurs, the Chair may inform Board members and will instruct the Chief Executive to report to the Regulator and/or Audit & Risk Committee as appropriate, in line with the IRML process.

Roles and Responsibility

The Board

Being conversant with the requirements of statutory and regulatory bodies which govern the Group's business activities, e.g. Fire and Rescue Service, Health and Safety Executive (HSE), Environment Agency, Local Authority and Homes England/Regulator of Social Housing

- Demonstrating strong leadership and a positive culture on matters relating to health and safety
- Setting the Group's health and safety direction and expectations using a risk based approach
- Ensuring health and safety matters form an integral part of business operations
- Ensuring health and safety arrangements are adequately resourced and supported
- Ensuring annual budgetary decisions do not adversely affect health and safety arrangements
- Ensuring all significant business decisions affecting the health and safety of employees and customers reflect the commitments prescribed in this Policy

Chief Executive Officer

Has the overall and final accountability for Livv Housing Group's landlord compliance areas. Responsibility for each area of compliance is delegated appropriately throughout the organisation.

Executive Director of Property

Has been appointed as the Executive Director for compliance and is accountable to the Chief Executive for all operational matters relating to compliance.

Director of Assets

Is accountable to the Executive Director of Property for all matters relating to compliance and ensuring that the Compliance Manager is provided with the necessary tools, equipment, training and data management systems to undertake their roles effectively.

Compliance Manager

- Will act as the competent person for the business and identify, plan and ensure operational delivery of compliance, ensuring statutory and regulatory requirements are met.
- Will have oversight of all areas of Property Compliance for the Livv Housing Group, ensuring ongoing evidence with all statutory obligations are maintained.
- Ensure that statutory and non-statutory servicing & maintenance contracts (in-house and external) are monitored, including inspections, checks, audits and surveys.
- Report any areas of concern or any areas of specific risk to the Director of Assets.

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- Ensure that compliance team are provided the necessary tools, equipment, training and data management systems to undertake their roles effectively.
- Ensure that the records in relation to statutory and non-statutory servicing contracts are maintained and reviewed periodically.
- Allocate as appropriate, remedial actions in relation statutory and non-statutory service reports to the appropriate person.

Compliance Team

Will be responsible for overseeing the effective operational delivery of all core and non-core compliance areas in line with the management plans, processes and procedures. The Compliance team will also be responsible for managing and undertaking quality assurance audits.

Staff and Tenant Communication

All compliance policies will be made available to staff via the company intranet.

All employees have a duty to co-operate with supervisors and managers on all compliance matters and must not interfere with anything provided to ensure that Livv Housing Group meets its statutory and regulatory obligations.

Tenants are communicated to through a variety of means to include:

- Tenant handbook which is available on the Groups internet page
- Customer Voice
- Ad hoc customer focus groups
- Ad hoc safety messages are posted to relevant tenants as and when required.

Compliance Training

A skills, knowledge, experience and training (SKET) matrix will be maintained by HR. Any training or skills gaps identified for staff undertaking a role with a compliance responsibility will form part of an ongoing individual learning and development programme.

Staff will be fully trained in the implementation of all compliance policies and accompanying procedures. This will include all staff from all areas of the Group who have any involvement in the organisation's compliance processes and procedures.

Policy Implementation

This policy is implemented through individual management plans, procedures and processes embedded in the delivery of each compliance area.

The Director of Assets shall be responsible for the operational delivery of and compliance with this policy, from the 'client' perspective

The Executive Director of Property is responsible for ensuring that adequate resources are made available to enable the objectives of the policy to be met.

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The Chief Executive retains the overall responsibility for the implementation of this policy and associated appendices.

Record Keeping

The Group will keep all necessary compliance records in relation to the management of servicing, maintenance works, asset information and audit records.

Stock asset information is held on an in-house asset management database called Promaster. Compliance activity and remedial actions are managed in Compliance 365 (C365). This allows reporting which help the Compliance Team to interrogate asset and compliance information to ensure statutory obligations are being appropriately discharged by the Group.

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Appendix A – Gas and Carbon Monoxide Safety Management Policy

Gas and Carbon Monoxide Safety Policy Statement

Livv Housing Group recognises its duties under the following regulations, Acts and British Standards:

- The Gas Safety (Installation and Use) Regulations 1998 as amended, which specifically deal with the installation, maintenance and use of gas appliances, fittings and flues in domestic and certain commercial premises.

Duty to Manage

To ensure compliance and mitigate risk, Livv Housing Group will ensure that:

- All landlord owned, tenanted domestic property gas, solid fuel and oil burning systems, installations and appliances are annually safety checked and serviced in accordance with manufacturers' instructions.
- Each Landlord Gas Safety Record (LGSR) contains all nine mandatory (salient) points
- All tenants' own appliances are visually checked. If deemed unsafe, they will be disconnected before the gas safe engineer leaves the site.
- All non-domestic or community/communal heating schemes are annually safety checked and serviced by an appropriately qualified Gas Safe contractor with commercial appliance experience.
- Only Gas Safe Registered Contractor(s) and Operatives are used on Livv Housing Group properties.
- Gas Safe Contractor(s) maintain and can exhibit upon request training records and operative qualifications for all operatives working on Livv Housing Group properties.
- Gas Safe Contractor(s) conduct Quality Control Checks and protocols which meet Gas Safe recommended standards.
- During the LGSR, the gas safe operative will check all smoke alarms and Carbon Monoxide Detectors.
- All empty properties will be capped off at the point keys are returned or, for new build properties, at the point of handover.
- Supply each tenant with a copy of the LGSR by the contractor within 28 days of the inspection being completed. New tenants will be provided with a copy of the gas safety record at the point the gas supply and heating system are recommissioned for their use.
- Properties that have no gas supply are annually checked records kept to confirm it has not been connected and that no LPG, oil or solid fuel devices are in use.
- Where properties are isolated off grid or have been disconnected by the supplier, we will conduct annual gas carcass testing.
- Any vulnerability issues are taken into account before initiating legal action against a resident who fails to allow access for this purpose.
- We will ensure boilers with over 60 kW heat input receive two safety inspections per year, comprising one major and one minor service in the Spring and Autumn
- In line with best practice and business policy, and with due consideration of any vulnerability, Livv Housing Group will take legal action against those residents who fail to allow access for the service to be carried out after all reasonable measures have been taken.

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- Solid fuel appliances shall be checked twice within a twelve-month period, and one of the checks will include a sweep of the chimney
- The appropriate HETAS (solid fuel) or OFTEC (oil) certification will be retained by the Compliance Team for updating of Orchard /Promaster and retention within C365 and Documotive
- Livv Housing Group must ensure that a copy of the CS/CR is displayed centrally in the communal area and a copy will be made available to any customer/ leaseholder on request

Best Practice

Livv Housing Group is committed to the delivery of exemplar compliance standards and has committed to: -

- Complete 100% Desk Top Quality Assurance check of all LGSR and associated solid, Oil and biomass Certificates.
- Complete 5% on site internal Quality Assurance Inspection post work checks.
- Complete 5% on site independent Service Quality Assurance Inspection post work checks.
- Complete Customer Satisfaction Surveys of 5% of completed services / safety checks.
- Ensure that any landlord owned Solid Fuel or Biomass heating or cooking sources are annually safety checked, serviced and flues / chimneys swept in accordance with HETAS Certificate of Compliance Accreditations. Tenant appliances will also be checked.
- Ensure that any landlord owned oil heating or cooking sources are annually safety checked, serviced and maintained by an OFTEC Qualified Engineer. Tenant appliances will also be checked.
- Ensure that any landlord owned renewable or green energy heating or cooking sources are annually safety checked, serviced and maintained in accordance with IEEE 1013, 1361, 1526, 1547, 1561 & P2030 Standards and ESS WG and EDS Best Practice. Tenant appliances will also be checked.
- We will check all smoke detectors and carbon monoxide alarms at the time of the LGSR or heating check
- Take appropriate legal advice and action to exhaust all reasonable avenues to obtain access to difficult to reach tenants / properties.

Key Performance Indicators

Performance monitoring will be undertaken in the following areas to assess the impact of the policy and meet industry standards reporting to take place once per week:

- Properties with a valid LGSR (100%)
- Properties overdue at legal stage (0%)
- Properties with other heating types (100%)
- Commercial Boilers and Pressure Vessels (100%)

PLEASE REFER TO THE GAS & CARBON MONOXIDE SAFETY MANAGEMENT PLAN, PROCESS AND PROCEDURE MAPS, AND MANAGEMENT MANUAL TO DEFINE HOW THIS POLICY STATEMENT WILL BE DELIVERED AND LINES OF RESPONSIBILITY AND ACCOUNTABILITY TO ENSURE COMPLIANCE.

APPENDIX B - Electrical Safety Management Policy

Electrical Safety Policy Statement

Livv Housing Group recognises its duties under the following regulations, Acts and British Standards:

- The Electricity at Work Regulations 1989 (EAWR) as amended and British Standard, BS 7671.
- The IET 18th Edition of the Wiring Regulations 2018:BS7671
- Section 2.2 of the Health & Safety at Work Act 1974 (HSWA)
- Supply of Machinery (Safety) Regulations 2008 and BSEN 12453:2001
- BS EN 62305:3:2011: 'Protection against Lightning – Physical damage to structures and life hazard'

The regulations apply to all electrical systems and equipment and the British Standard applies to the design, selection, erection, inspection and testing of electrical installations, whether permanent or temporary, in and about buildings which are under the control of Livv Housing Group.

Electrical Safety will comply with Landlords and Tenants Act 1985, Occupiers' Liability Acts 1957 & 1984, S96 Housing Act 1985 (1), BS7671 and all other relevant legislative and regulatory standards, including, but not limited to, the HSE Approved Code of Practice L56 4th edition, CDM impact on voids and major works, R8 of GSIUR for reinvestment work, the Smoke & Carbon Monoxide Alarm (England) Regulations 2015 and the Health and Safety at Work Act 1974

Duty to Manage

To ensure compliance and mitigate risk, Livv Housing Group will:

Electrical Installations

- Ensure only NICEIC Part "P" qualified Electrical Contractor(s) and Operatives are used on Livv Housing Group properties.
- Ensure that all communal areas and non-domestic installations are tested at a maximum of every 5 years.
- Ensure that all leisure facilities installations are tested at a maximum of every 3 years.
- Ensure that all domestic installations including new build and rewires are tested up to a maximum of every 10 years for new build installations to Part "P" and full rewires, in accordance with IEE Regulations (18th edition).

Portable Appliance Testing

Livv Housing Group does not normally issue electrical appliances to tenants but there are instances where an appliance may be issued in the short term i.e. Heater issued in severe cold weather. Any electrical appliance issued will have the CE Mark, the British Standard Kitemark or the 'BEAB Approved' mark and receive a regular portable appliance test (PAT) in line with HSG107 "Maintaining Portable Electrical Equipment".

Best Practice

Livv Housing Group is committed to the delivery of exemplary compliance standards and has committed to:

- Ensure inspections and testing of fixed wiring systems within domestic and communal properties takes place on a 5 year cycle (or sooner if recommended by the competent person undertaking the test).
- Hold a valid EICR (valid EICRs could include properties with outstanding Category (C) 2 and C3 works which are within acceptable limits and are works involving longer term investment) or other appropriate certification for all properties.
- Complete all C1 and C2 works at the time of the EICR Test unless not possible to do in which case ensure works are programmed urgently.
- CAT 3 works will be captured as part of EICR testing and monitored. If there is any deterioration between tests, the necessary works will be completed.
- Where properties are identified as “electric only” we will visit annually to carry out a visual inspection, check smoke detectors and make sure that the tenant(s) are not using Liquid Petroleum Gas appliances. If an appliance is found in situ we will arrange for a Landlord Gas Safety Record visit.
- All electrical specialist installations (ie. Electric gates) will be maintained in line with industry guidelines.

Key Performance Indicators

Performance monitoring will be undertaken in the following areas to assess the impact of the policy and meet industry standards:

- 100% of Communal Properties having a valid Electrical Installation Condition Report (EICR) within the cycle
- 100% of Domestic Properties having a valid Electrical Installation Condition Report (EICR) within the cycle
- 0% Of properties with outstanding C1
- 100% of Portable Appliance Testing (PAT) completed
- 100% of automated doors risk assessed /serviced
- 100% of automated gates and barriers risk assessed /serviced
- 100% of Lightning Conductors inspected and tested
- 100% of remedial actions will be completed in line with EICR guidance

PLEASE REFER TO THE ELECTRICAL SAFETY MANAGEMENT PLAN, PROCESS AND PROCEDURE MAPS, AND MANAGEMENT MANUAL TO DEFINE HOW THIS POLICY STATEMENT WILL BE DELIVERED AND LINES OF RESPONSIBILITY AND ACCOUNTABILITY TO ENSURE COMPLIANCE.

APPENDIX C – Asbestos Safety Management Policy

Asbestos Control & Management Policy Statement

Livv Housing Group recognises its duties under CAR 2012, Health and Safety at Work etc. Act 1974 and Landlord Tenant Act 1985, and other relevant legislation to demonstrate and implement robust control measures to facilitate in the continuous conformity with legislation in the management of asbestos.

Livv Housing Group has made a commitment to complete 100% asbestos management surveys on all of its domestic stock by 31st March 2024.

Duty to Manage

Livv Housing Group has the “duty to manage asbestos” in:

- All non-domestic buildings.
- The common areas of domestic buildings, e.g. halls, stairwells, lift shafts, service ducts, roof spaces etc.
- Although the Duty to Manage does not currently affect all other domestic properties (such as houses and flats) Livv Housing Group wishes to adopt best practice to safeguard tenants, visitors, operatives and other occupiers within the housing stock, and will undertake surveys on such properties as work dictates.

Livv Housing Group will ensure that:

- Premises are assessed to determine if they have any potential Asbestos Containing Materials (ACMs) and make a presumption that materials contain asbestos until tested.
- Make and keep an up-to-date record of the location and condition of the ACMs or presumed ACMs in all inspected premises.
- Assess the risk from the material and record and maintain such records in a a detailed risk assessment.
- Prepare a plan that sets out in detail how Livv Housing Group will manage any ongoing risk.
- Ensure that Risk Assessments and Management Plan Actions are executed in a timely manner.
- Set up a system for providing information on the location and condition of the material to anyone who is liable to work on or disturb it (Asbestos Register).
- Ensure Tenants have the facility to request and receive information as to known ACMs and arrangements in place to manage same. General information will be available via the Livv Housing Group website and at the sign up of a new tenancy. Property-specific surveys will be available upon request.
- Provide Asbestos Management Briefing / Advice Leaflets for tenants as required and requested
- Appoint a “competent person(s)” to carry out all or part of the work to meet the requirements of the duty.

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- Surveys, samples and analysis will be carried out by accredited to United Kingdom Accreditation Service (UKAS) and will exhibit appropriate qualifications / accreditation prior to any instruction.
- The “competent person(s)” will hold appropriate qualifications and may carry out Quality Assurance or Re-Inspection Surveys.
- Any incident relating to asbestos is thoroughly investigated to establish root cause and embed lessons learnt. Please refer to IRML.

Best Practice

Livv Housing Group is committed to the delivery of exemplar compliance standards and has committed to:

- Complete 100% Asbestos Management Surveys to all non-domestic buildings and common areas
- Complete 100% Asbestos Management Surveys to all domestic dwellings by 31st March 2024
- Complete Asbestos Refurbishment Surveys prior to all intrusive works.
- Carry out Intrusive Asbestos Sampling and Testing in advance of any destructive works.
- Regularly inspect and re-assess the condition of any ACMs based on property type and risk assess:
 - The material condition
 - The likelihood that asbestos fibres could be released into the air
 - The effectiveness of encapsulation
- Where monitored ACMs are deemed to be in a poor condition, appropriate remedial works will be implemented.
- Livv Housing Group will review its asbestos management procedure to ensure clear responsibilities are assigned to relevant staff to safely facilitate future 3rd party works. Part of this process will consist of reviewing the Permit to Work systems.

Key Performance Indicators

Performance monitoring will be undertaken in the following areas to assess the impact of the policy and meet industry standards:

- 100% of Block / Communal / Commercial (non-domestic) Properties with an in date asbestos survey
- 100% of Block / Communal / Commercial (non-domestic) Properties with an in date re-inspection survey
- 100% Asbestos Remedial works completed within target

PLEASE REFER TO THE ASBESTOS SAFETY MANAGEMENT PLAN, PROCESS AND PROCEDURE MAPS, AND MANAGEMENT MANUAL TO DEFINE HOW THIS POLICY STATEMENT WILL BE DELIVERED AND LINES OF RESPONSIBILITY AND ACCOUNTABILITY TO ENSURE COMPLIANCE.

Fire Safety Policy Statement

Livv Housing Group recognises its duties under the following regulations, Acts and British Standards:

- The Regulatory Reform (Fire Safety) Order 2005
- The Housing Act 2004
- The Building Regulations, and other relevant legislation to demonstrate and implement robust control measures to facilitate in the continuous conformity with legislation in the management of Fire risk.

Duty to Manage

Livv Housing Group will ensure that:

- All assets are risk assessed taking into consideration all know risk factors including archetypal risk, occupancy risk, passive and active fire management activities and external known factors.
- A suitable Fire Risk Assessment (FRA) is undertaken by an appropriately trained and experienced competent person.
- That management actions and remedial works arising from the FRA are actioned and tracked to completion, including evidence of completion, including photographs and relevant certification.
- Fire Safety systems and fire safety equipment (refer to Appendix H), where fitted, are maintained to the recommended standards through regular programmes of cyclical maintenance.
- That those within Livv Housing Group with a fire safety responsibility are appropriately trained to full fill their roles
- Any remedial works which cannot be or are not delivered within FRA advised timescales will be assessed jointly by Livv Housing Group and the competent person and appropriate risk mitigation measures will be taken to ensure ongoing tenant / resident safety.
- Livv Housing Group will maintain a Master Database of all properties where it has a responsibility to provide an FRAs.
- Livv Housing Group will maintain a Master Database of all properties where specific cyclical management activities are identified.
- Any contact with the Fire and Rescue Service will be reported corporately as defined in the Incident Risk Management and Learning (IRML) Framework.

Best Practice

Livv Housing Group is committed to the delivery of exemplar compliance standards, Local Government Group “Fire Safety in Purpose Built Blocks of Flats and (associated MHCLG Guidance) and has committed to:

- All properties subject to the RRFSSO will be subject to an FRA. FRAs will only be undertaken by contractors deemed competent in accordance with this Plan. Reports shall follow PAS 79 with a separate action plan.

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- For new build properties of refurbished premises, an FRA will be undertaken prior to occupation.
- Remedial actions will be prioritised according to the nature of the risk identified within the FRA and timescales for completion will be provided by the competent person. If there is a reason to suspect that the FRA may no longer be valid, this will prompt a new FRA. This decision is made by the Responsible Person.
- Where the risk assessment indicates that work being carried out by a contractor has a foreseeable risk of an impact on existing fire safety measures in a building, Livv Housing Group will ensure that an appropriate volume of post project fire safety checks, proportionate to risk, will be completed by a competent person independent to the contractor. This check will provide confirmation that all existing fire safety measures remain in place and are fully functional.
- Environmental Services Operatives (ESOs) will undertake basic fire safety training and will use inspection logs to report basic fire safety issues, such as door faults, damage to fire safety compartmentation; and to monitor compliance with the Group’s Fire Safety in Communal Areas Policy.
- The frequency of FRA’s will be based on risk level as table below:

Property Classification	Frequency
Level 1	Annual
Level 2	2 yearly
Level 3	3 yearly
Level 4	N/A
Level 5	N/A
Other	N/A

Key Performance Indicators

Performance monitoring will be undertaken in the following areas to assess the impact of the policy and meet industry standards:

- 100% of properties with a completed and in date FRA where required
- 0% of buildings with outstanding and overdue remedial actions
- 100% of buildings with fire safety systems/equipment present where all systems/equipment has been tested/maintained in accordance with this management plan.

PLEASE REFER TO THE FIRE SAFETY MANAGEMENT PLAN, PROCESS AND PROCEDURE MAPS, AND MANAGEMENT MANUAL TO DEFINE HOW THIS POLICY STATEMENT WILL BE DELIVERED AND LINES OF RESPONSIBILITY AND ACCOUNTABILITY TO ENSURE COMPLIANCE.

Water Safety Policy Statement

Livv Housing Group recognises its duties under the following regulations, Acts and British Standards:

- Sections 3(2) & 53 Health and Safety at work Act 1974,
- Control of Substances Hazardous to Health Regulations 2002,
- Control of Legionella in Water Systems L8 Approved Code of Practice 2013 (ACOP) fourth edition and HSG 274 Part 2.

Duty to Manage

For all Non-Domestic Installations Livv Housing Group will:

- Notify under RIDDOR and NTEC (if necessary)
- Carry out monthly monitoring of non-domestic installations
- Test water samples from tank storage annually
- Conduct bi-annual inspections of communal tanks and any non-domestic installations, this inspection will be a visual inspection only unless the condition has deteriorated and the installation merits a full sampling and test inspection.
- Take reasonable measures to identify “little-used” outlets and subject same to a weekly flush.

Duty to Assess Risk of Exposure

When visiting, working or living in and around Livv Housing Group premises, it is essential that the risk of exposure to legionella bacteria is minimised, strictly managed and controlled.

Livv Housing Group as an employer and landlord has a responsibility to reduce the risks of exposure to legionella. As part of its duty, Livv Housing Group will ensure sources of risk are identified and assessed, risks are prevented or managed appropriately and that up to date records are maintained.

To ensure compliance and mitigate risk, Livv Housing Group will:

- Appoint a competent person(s) with sufficient authority and knowledge of the installations to help take the measures need to be compliant
- Identify and assess sources of risk through a programme of risk assessment.
- Manage any risks through written schemes of control.
- Prevent or control any risks through remedial actions.
- Keep and maintain the correct records.

Best Practice

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Livv Housing Group is committed to the delivery of exemplar compliance standards and has committed to ensure domestic Installations are:

- Flushed out prior to letting or re-letting the property.
- We will avoid debris getting into the system (we will ensure that domestic cold water tanks, where fitted, have a tight fitting lid).
- Set control parameters (e.g. setting the temperature of the hot water cylinder (chlorifier) to ensure water is stored at 60°C) In addition we fit thermostatic control / anti scald valves in the interests of tenant safety.
- Ensure that new central heating installations install combination boilers and all new showers are electric to remove the need for water storage.
- Remove redundant pipework as and when identified.

Key Performance Indicators

Performance monitoring will be undertaken in the following areas to assess the impact of the policy and meet industry standards:

- 100% of schemes identified as requiring Legionella Risk Assessments will be assessed
- 100% of properties within a legionella maintenance regime where testing has been completed and valid certification is in place.
- 100% of management actions will be delivered in line with LRA guidance.

PLEASE REFER TO THE WATER SAFETY MANAGEMENT PLAN, PROCESS AND PROCEDURE MAPS, AND MANAGEMENT MANUAL TO DEFINE HOW THIS POLICY STATEMENT WILL BE DELIVERED AND LINES OF RESPONSIBILITY AND ACCOUNTABILITY TO ENSURE COMPLIANCE.

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APPENDIX F – Lifts and Lifting Equipment Safety Management Policy

Lift and Lifting Equipment Safety Policy Statement

Livv Housing Group recognises its duties under the following regulations, Acts and British Standards:

- LOLER (Lifting Operation and Lifting Equipment Regulations) 1998
- PUWER (Provision and Use of Work Equipment Regulations) 1998
- The Health and Safety at Work Act 1974
- The Management of Health and Safety at work Regulations 1999.

All lifting operations involving lifting equipment must be properly planned by a competent person, appropriately supervised and carried out in a safe manner.

All systems will comply with the Building Regulations that applied at the time of installation. LOLER also requires that all equipment used for lifting is fit for purpose, appropriate for the task, suitably marked and, in many cases, subject to statutory periodic 'thorough examination'. Records must be kept of all thorough examinations and any defects found must be reported to both the person responsible for the equipment and the relevant enforcing authority.

Duty to Manage

To ensure compliance and mitigate risk, Livv Housing Group will:

- Ensure lifting equipment (including lifting accessories) undergo one thorough examination and one service within a 12 month cycle.
- Always have lifting equipment thoroughly examined following 'exceptional circumstances', e.g. if it is damaged or fails, is out of use for long periods, or if there is a major change in how it is used which is likely to affect its integrity.
- Inspect lifting equipment and accessories

The Group will ensure that:

- We will maintain an "examination scheme" supervised by a Competent Person at such intervals which may be appropriate for:
 - Pull / Cable / Hydraulic Lifts
 - Through Floor and Platform Lifts
 - Medical hoists and lifting equipment
 - Construction Equipment – via contractor method statements and risk assessments

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Responsible Officer: Executive Director – Property

Review Date: May 2022

Best Practice

Livv Housing Group is committed to the delivery of exemplar compliance standards and has committed to:

- Compliance with the Safe Use of Lifting Equipment Code of Practice (ACOP)
- Annual service
- 6-monthly Safety Check and Load Test for all passenger lifts
- Safe to Use Certification which meets LOLER criteria by accredited specialist contractors
- All tests will be recorded on the management system

Key Performance Indicators

Performance monitoring will be undertaken in the following areas to assess the impact of the policy and meet industry standards:

- Passenger lifts with valid through examination and servicing certificate (100%)
- Stair lifts with a valid certificate (100%)
- Domestic vertical lifts with a valid certificate (100%)
- Ceiling hoists with a valid certificate (100%)
- Step lifts with a valid certificate (100%)

PLEASE REFER TO THE LIFTS & LIFTING EQUIPMENT SAFETY MANAGEMENT PLAN, PROCESS AND PROCEDURE MAPS, AND MANAGEMENT MANUAL TO DEFINE HOW THIS POLICY STATEMENT WILL BE DELIVERED AND LINES OF RESPONSIBILITY AND ACCOUNTABILITY TO ENSURE COMPLIANCE.

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APPENDIX G – Non-Core Compliance Facilities Services Policy

Non-Core Compliance Estate Services Policy Statement

Livv Housing Group recognises its duties to maintain compliance relating to areas of compliance that don't naturally sit under the remit of the big six compliance areas as listed in appendix A – F.

These non-core areas consist of the following:

- Trees
- At height systems including Mansafe systems, Edge protection, eyebolts, cranes
- Windows including window restrictors, communal and supported needs, fire rating glazing (which while covered in an FRA) can be checked regularly
- Sewage and waste management systems
- Energy Performance Certificates
- Security and CCTV management systems, emergency panic alarms
- Bin chutes
- Items fitted for mobility that fall outside of other categories

Duty to Manage

For all Non-Core areas Livv Housing Group will:

- Provide clear lines of responsibility for the management of all systems covered by this plan supported by written guidance on procedure and process.
- Establish overarching process for delivery of work under the policy
- Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake safety checks and maintenance, which shall include legal action when required.
- Proactively assess available data for relevant information about the customer to help gain access (disability, vulnerability, local connections, etc.)
- Maintain an emergency process for dealing with suspected breaches in non-core areas
- Maintain an up to date master database of all properties
- For each compliance area maintain an up to date database confirming which of the systems and components within the scope of this policy exist and do not exist (binary basis) and the associated responsibility
- Where a requirement does not exist hold appropriate evidence to demonstrate that no obligation exists
- Where remedial works are required hold evidence relating to their current status and if complete, hold evidence of completion
- Undertake monthly reconciliations of all non-core compliance attributes
- Appoint a competent person(s) with sufficient authority and knowledge of the installations to help take the measures needed to achieve or maintain compliance

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Key Performance Indicators

Performance monitoring will be undertaken in the following areas to assess the impact of the policy and meet industry standards:

- 100% of non-core compliance attributes will be recorded, new items will be added on discovery or installation
- 100% Risk assessments will be carried out where required
- 100% of all relevant certification will be recorded and maintained

PLEASE REFER TO THE NON-CORE COMPLIANCE FACILITIES SERVICES MANAGEMENT PLAN, PROCESS AND PROCEDURE MAPS, AND MANAGEMENT MANUAL TO DEFINE HOW THIS POLICY STATEMENT WILL BE DELIVERED AND LINES OF RESPONSIBILITY AND ACCOUNTABILITY TO ENSURE COMPLIANCE.