



Housing Services  
Compliance policy (2021)

# Document Control

## Document details

<b>Name</b>	Compliance policy (2021)
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## Version history

Version	Change	Date	Dissemination
<b>v.1</b>	Initial draft	07/06/20	
<b>v.2</b>	Updated with Comments from POS	10/08/20	
<b>v.3</b>	Minor amendments following Savills recommendations	21/01/21	

## Approval history

Version	Change	Date	Approving body
<b>v.1</b>	-	06/08/2020	Housing Compliance Board
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<b>v.3</b>		03/02/21	Compliance Board

Equality analysis assessment

Date	Completed by	Review date
16/06/2020	James Delaney	July 2023

## **1 – Contents**

<b>1- Contents</b>	<b>page 3</b>
<b>2- Introduction</b>	<b>page 4</b>
<b>3- Related Documents</b>	<b>page 5</b>
<b>4- Equalities Statement</b>	<b>page 5</b>
<b>5- Legal Context</b>	<b>page 5</b>
<b>6- Roles and Responsibilities</b>	<b>page 6</b>
<b>7- Training</b>	<b>page 7</b>
<b>8- Residents Responsibilities</b>	<b>page 8</b>
<b>9- Data Storage &amp; Sharing</b>	<b>page 8</b>
<b>10- Gas Safety</b>	<b>page 9</b>
<b>11- Electrical Safety</b>	<b>page 13</b>
<b>12- Lift Safety</b>	<b>page 16</b>
<b>13- Legionella</b>	<b>page 18</b>
<b>14- Governance &amp; Assurance</b>	<b>page 20</b>
<b>15- GDPR &amp; Data Protection</b>	<b>page 20</b>

## 2 Introduction

### COVID-19 Information

The London Borough of Havering is committed to ensuring the safety of all residents, staff, contractors and visitors & meeting its responsibilities under the Health and Safety at Work, etc. Act 1974 the Management of Health and Safety at Work Regulations 1999, and associated protective legislation.

Robust safety procedures are in place at all offices and locations, which includes a comprehensive risk assessment in relation to COVID-19.

Any staff, third party suppliers, contractors or visitors who require access to facilities, are provided with a full briefing outlining the steps the borough has taken to ensure the highest standards of safety, health and hygiene are maintained at all times.

Additional control measures have been introduced and are reviewed and amended & communicated in line with the latest government and PHE advice;.

- 2.1 The London Borough of Havering considers providing high quality and safe homes to our residents as of paramount importance and takes robust approaches to ensure that safety.
- 2.2 This policy provides a structural approach, which identifies the key areas to ensuring we manage our responsibilities to comply with all relevant legislation & regulations for electrical, gas, legionella & lift safety. It sits alongside our asbestos policies and fire safety policies as the core documents to achieve this in properties owned and managed by the London Borough of Havering.
- 2.3 We will implement systems for managing all aspects of compliance and will keep all our systems and processes under review to ensure that they remain fit-for-purpose and are dynamic and adaptive to change as and where needed.
- 2.4 Clear roles and responsibilities have been defined and these associated to each action and mitigation identified as required safeguarding for residents and staff.
- 2.4 We will co-operate, co-ordinate and actively collaborate with all third-parties and enforcing authorities, fostering a culture of trust and transparency.

### **3 Related Documents**

Tenancy agreements:

- Repairs Policy
- Fire Safety Policy
- Asbestos Policy
- Landlords Consent Policy
- Rechargeable Repairs Policy
- Complaints Policy (Havering)

### **4 Equalities Statement**

The Council is committed to promoting fair and equal access to services and equal opportunities in employment, the procurement of goods and as a community leader. The Council's policies, procedures and day-to-day practices have been established to promote an environment which is free from unlawful and unfair discrimination, while valuing the diversity of all people.

Discrimination on the grounds of race, nationality, ethnic origin, religion or belief, gender, marital status, sexuality, disability and age is not acceptable: the Council will take action to ensure no person using the council's premises or services receives less favourable treatment or is disadvantaged by requirements or conditions that cannot be justified. The Council will tackle inequality, treat all people with dignity and respect and continue to work to improve services for all service users.

The legal framework for the Council's approach is provided by the Equality Act 2010 and specifically by the Public Sector Equality Duty, under which a public authority must work consciously to eliminate discrimination, harassment, victimisation and to advance equality of opportunity and foster good relations between people with differing characteristics.

### **Legal Context**

### **5**

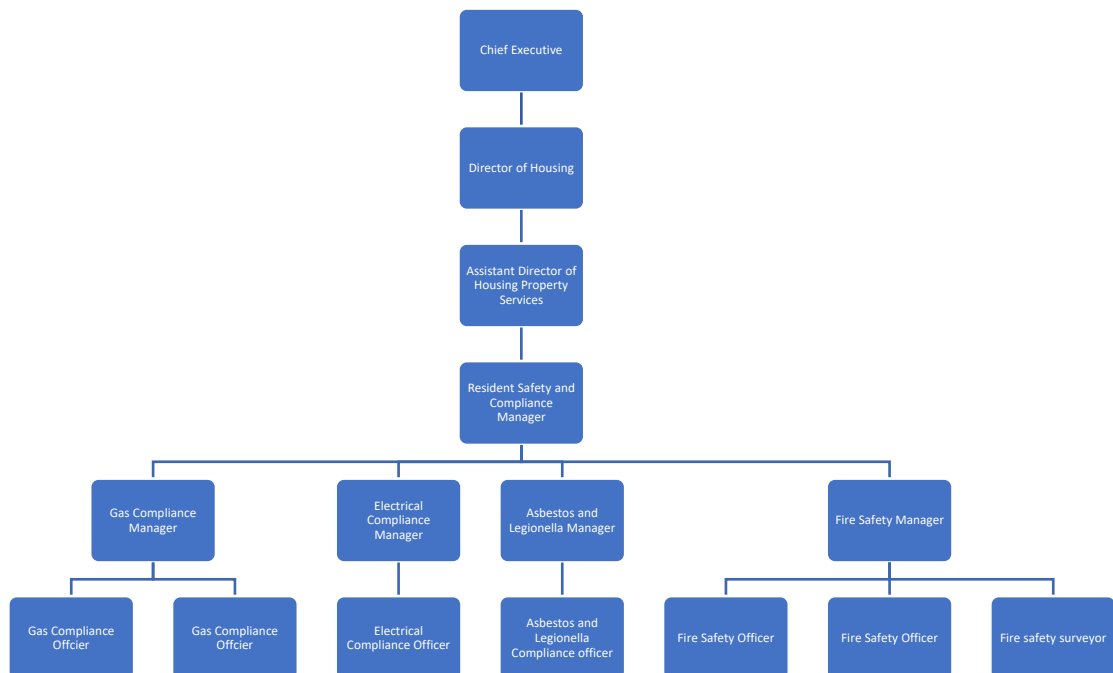
- Health and Safety at Work Act
- Gas Safety (installation and Use) Regulations
- Gas Safety Management Regulations
- HSE L8 approved code of practice – The Control of Legionella Bacteria in water systems
- Electrical Safety - Electrical Regulations BS7671 - 18th edition
- Lightning Protection - BS EN 62305
- Emergency Lighting - BS 5266

- Corporate Manslaughter and Homicide Act
- Landlord and Tenant Act
- Housing Act
- COSHH Regulations
- RIDDOR
- RRFSSO Regulations – Fire Alarms BS5839
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)

## 6 Roles and Responsibilities

Accountable Person	Chief Executive of Havering
Duty Holder	Director of Housing
Assistant Duty Holder	Assistant Director of Property Service
Responsible Person	Resident Safety and Compliance Manager

### 6.1 Staff Structure



### 6.2 Explicit Responsibilities

<b>Stakeholder</b>	<b>Responsibility</b>
<b>Accountable Person</b>	Responsible for all areas of Housing Compliance and the implementation of this policy Delegating duties to relevant officers.
<b>Duty Holder</b>	Ensure there are sufficient resources available for the delivery of this policy, both financial and staff. Determine appropriate resident engagement strategy Approve appropriate governance and assurance structure Approve audit approaches Approve reporting to regulatory bodies
<b>Assistant Duty Holder</b>	Ensuring resources are appropriately allocated to ensure robust governance and assurance regime is in place. Provide relevant information to regulatory bodies Provide information to internal or external auditors as required
<b>Responsible Person</b>	Responsible for the full operational delivery of this policy and associated procedures Monitoring and review of all activities Ensuring staff awareness and training Report all issue to Duty holder or assistant duty holder as required Ensuring all relevant systems are updated
<b>Asset Manager</b>	Responsible for ensuring data has been correctly uploaded into the assets management system
<b>All Housing Staff including Caretakers</b>	To ensure the compliance policy is enforced To ensure compliance is considered as part of all projects
<b>All Staff</b>	To report any areas of concern within an appropriate timescale

## 7 Stakeholders

### 7.1 Residents and Leaseholders

The White paper highlighted the need to engage residents in the safety of buildings and treat them as partners, both to seek their views and opinions but also to ensure they understand their duties.

We will therefore:

Make compliance data available to residents on request

Ensure engagement is embedded in our core service offer both during works programmes and under normal circumstances

Ensure residents are involved in decisions around health and safety works to their homes

Ensure complaints are dealt with fairly and transparently

Ensure all residents are made aware of relevant strategies, LBH responsibilities and residents responsibilities at the time of sign up



Ensure residents are aware of how to raise concerns or issue with health and safety within their buildings

## 7.2 Regulator of Social Housing

As a provider of Social Housing LBH is accountable to the regulator for Social Housing who take a co-regulation approach to ensuring providers meet economic and consumer standards, explicitly that contained in the home standard

Registered providers shall meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes

The Director of Housing will be responsible for managing a proactive relationship with the Regulator and to ensure all standards are met.

## 7.3 Councillors

The Regulator for Social Housing stated in its review of the consumer standards in 2019 that;

Boards and Councillors are responsible for ensuring registered providers meet the consumer standards, this is a fundamental part of the registered providers' commitment to co-regulation. Registered providers should have the systems and processes in place to provide assurance to their Boards and Councillors that the standards are being met.

We will ensure that Compliance is reported monthly to Councillors via the Themedboard and all exceptions are highlighted. Action plans for achieving compliance will be shared with Councillors.

We will provide an annual Compliance Statement at the end of each financial year detailing our position and remedial actions required.

## 8 Training

For staff the below training will represent the minimum competency standard required for each role. However, we will accept that where staff are working towards a qualification, and supervised by suitably experienced managers, then they will be able to undertake the role, this approach will support the in-house development of staff

Stakeholder	Training	Frequency
Accountable Person	General understanding of compliance issues and legal framework	Bi annually
Duty Holder	General understanding of compliance issue and legal framework	Bi annually
Assistant duty holder	Housing Compliance – legal and statutory framework	Annually

<b>Responsible Person</b>	RQF Level 2 Award in Gas Safety Awareness in Social Housing Electrical Duty Holder Course LOLER awareness training Legionella awareness training	On change of regulations
<b>Gas Compliance Manager</b>	RQF Level 2 Award in Gas Safety Awareness in Social Housing	On change of regulations
<b>Electrical Compliance Manager</b>	Electrical Duty Holder Course	On change of regulations
<b>Housing Staff including caretakers</b>	General awareness training	Bi-annually

## 9 Residents Responsibilities

- 9.1 Whilst LBH have a duty to ensure the safety of each of our properties, tenants have a duty to assist and not to do anything which may compromise that safety.
- 9.2 Tenants will be expected to provide access to engineers in line with their tenancy agreement. Failure to do so will result in appropriate sanctions and we may issue warrants to ensure access.
- 9.3 Where tenants damage appliances or equipment they will be recharged the full cost to replace the items, plus a management fee and any other associated costs (please see repairs policy).
- 9.4 Where tenants wish to undertake works to systems or appliances, or to install their own fittings, they must apply for, and receive, landlord's consent prior to undertaking the works. Landlord's consent will only be granted where it can be shown, and evidenced, that works will be undertaken by appropriately qualified and experienced operatives and will not compromise the health and safety of the residents of the property or any other property. Please refer to the landlord's consent policy.

## 10 Data Storage and Sharing

- 10.1 All information regarding appliances and equipment will be held in the Keystone Asset management database and this will be shared with staff, residents and contractors as deemed necessary.
- 10.2 As a minimum information will be held on the type of equipment, its actual or estimated installation date, its due date for replacement and the last service date.
- 10.3 All compliance programmes will be maintained on Keystone. Contractors undertaking safety checks will be expected to provide information on servicing in a

format and frequency which allow the housing compliance team to update the information on Keystone and monitor performance and compliance.

- 10.4 The compliance officers will be responsible for ensuring all data relating to compliance, including actions which flow, are correctly updated, stored and managed. This may be via spreadsheets or a proprietary system. They will be responsible for overseeing the compliance programme, and the raising, tracking and completion of works orders on the repairs system.
- 10.5 The Housing Asset Management Team will provide an overview and scrutiny function to ensure the data is being entered correctly and report on any anomalies found.
- 10.6 The housing asset management team will provide assurance that Keystone is being updated and compliance maintained.

## **11 Gas Safety**

### **Generally**

- 11.1 All engineers/contractors working on gas appliances will be Gas Safe registered and must provide proof of their registration prior to being allowed to undertake any works for LBH.
- 11.2 Gas Safe Registration will be validated by LBH.
- 11.3 All contractors undertaking gas works must provide relevant insurance and indemnities prior to starting works which must include adequate cover for undertaking hot works.
- 11.4 All engineers visiting residents' properties must show resident both their personal identification card and Gas Safe registration card prior to starting works.
- 11.5 All engineers entering residents homes will be DBS checked prior to commencing works for LBH.

### **Servicing**

- 11.6 All domestic properties with a gas-burning appliance will receive an annual service, no later than 12 months after the last service.
- 11.7 All communal gas fired systems will receive an annual service no later than 12 months after the last service.
- 11.8 LBH will keep a database of all service records and manage the programme of servicing using Keystone asset management system.
- 11.9 Contractors undertaking servicing programmes on behalf of LBH must demonstrate professional standards via accreditations e.g. UKAS management systems, Chas & or Constructionline. They must make all reasonable attempts to access each property;

this must be recorded and evidenced where necessary. This must include at least two formal written letters.

11.10 Where contractors are unable to gain access to a property this must be referred back to LBH to take appropriate action. This will include at least two further letters, calls where contact details are available and a notice placed on the front door of the property.

11.11 If LBH are still unable to gain access to a property then we will take appropriate action to reduce the risk of an incident, this may include, but not be limited to:

- use a service interrupter to restrict the heating and hot water to a property if one is fitted;
- cap the gas at the meter if this is accessible;
- obtain a court warrant to force entry if necessary – the resident will be recharged for all court costs.

11.12 Where any of these options are necessary we will post a notice to the resident informing them of the approach and the steps they need to take to have the full service reinstated.

11.13 All contractors undertaking servicing will complete Landlord Gas Safety Reports (LGSR) and provide these to LBH with 3 days of completing each service.

11.14 All contractors will comply with Gas Safe best practice and the Gas Safety (Installation and Use) Regulation 1998.

11.15 At each service the engineer will either:

- Rectify any issues with the appliance to ensure it is left safely working and note these on the certificate.

or

- Where the appliance cannot be fixed it will be isolated to prevent further use and the contractor will inform LBH who will determine the next steps, which may be replacement on a like for like basis or replacement with an alternative heating system. In all cases, residents will be left with a temporary means to produce hot water and temporary of heating.

11.16 For all PSL properties into which LBH place residents a valid LGSR will be required prior to taking a new property, annually or at every change of tenant. LBH will undertake the servicing and re-charge the owner of the property.

## **Repairs and Maintenance**

- 11.17 Our contractors will attend to break down and repairs in line with the timescales given in our repairs policy. Where a boiler cannot be repaired, residents will be left with a temporary means to produce hot water and temporary heating.
- 11.18 All PSL properties that house LBH residents, with gas burning appliances must have an annual maintenance contract in place. Evidence of this must be provided to the PSL management team at the start of any new tenancies and on a yearly basis before the date of renewal.

### **Gas Carcass**

- 11.19 LBH has a duty to inspect all pipework (carcass) which runs from the meter to all gas appliances. Maintenance checks from the meter to the service pipework (external to the property) is not the responsibility of LBH, and is usually undertaken by the pipeline operator (e.g. TRANSCO). We will undertake all gas carcass checks no later than 12 months after the previous inspection.

### **New Installations**

- 11.20 Where an appliance is deemed beyond economic repair (BER) or is due for replacement under the Decent Homes programmes it will be replaced with a new appliance. This may be a different appliance with a different fuel type and may need to be situated in a different part of the property from the appliance being removed, subject to a site survey and system design.
- 11.21 In all new installations, the gas carcass between the meter and appliance will be renewed where survey reports indicates the following:
- The pipework has suffered considerable deterioration due to age;
  - Concealed pipework e.g. in (ceiling) voids making it impossible to check for leaks or assessing carcass condition; or
  - Poor configuration of pipe-runs during originally installation.

### **Works to tenants own appliances**

- 11.22 Residents are responsible for the maintenance and safety of their own gas appliances and must provide evidence to LBH of the safety of an appliance if requested.
- 11.23 Where the appliance is connected to either a gas carcass or flue maintained by LBH then the tenants appliance will be tested as part of the LBH safety checks as set out in Regulation 26(9).

- 11.24 Where the tenant's own appliance fails its safety checks, it will be made safe and a warning notice will be served, the resident will be advised to engage a Gas Safe engineer to rectify the issue.

#### **Void properties**

- 11.25 For all void properties which contain gas appliances, at the commencement of the void period LBH will ensure the gas is capped off for the duration of the void works.
- 11.26 At the end of the works period the system will be re-commissioned and a certificate provided to both LBH and the incoming resident, the next annual service will be no later than 12 months from the recommissioning of the appliance.
- 11.27 In flats where gas carcass is present to a cooker space, this will be removed and suitable provision for an electric only cooker will be provided.

#### **Mutual Exchanges properties**

- 11.28 Where a gas appliance is present in a mutual exchange property LBH will ensure a service has been completed and certification provided to both LBH and the incoming resident, the next annual service will be no later than 12 months from the recommissioning of the appliance.

#### **Gas appliances in rooms used for sleeping**

- 11.29 No open flue appliance will be allowed in rooms in which residents sleep. Whilst LBH would prefer no gas burning appliances in rooms used for sleeping, these will only be allowed where they are room sealed and the flue has been fully tested.
- 11.30 CO detectors will be installed in all rooms where this exists.
- 11.31 For PSL properties in which appliances are found in rooms used for sleeping, failure by the owner to provide an annual certificate, or where LBH undertake an inspection and the boiler fails its safety inspection, will result in the property being returned to the landlord.

#### **Gas Leaks and Carbon Monoxide**

- 11.32 Where a resident reports a suspected gas leak LBH will advise them to contact the local service provider in the first instance. LBH officers will work with the provider to establish if there has been a leak and remedial actions required.

- 11.33 LBH will install carbon monoxide detectors in rooms which contain a gas burning appliance. These will be tested at the same time as the gas service and replaced no later than 10 years from installation date.

### **Leaseholders**

- 11.34 Whilst LBH are not responsible for the maintenance and safety of leaseholders' appliances, Leaseholders will be expected to provide an annual safety certificate for all gas appliances in their properties. Failure to provide an appropriate certificate will lead to enforcement action by Home Ownership department.
- 11.35 Leaseholders can request that LBH carry out the annual service on their behalf through the term contracts. This will be charged at contract rates plus an administration fee of 15%.
- 11.36 This will be payable before the service and leaseholders must provide access for the engineer at the pre-arranged time. Failure to provide access at the pre-arrange time will result in a charge of £20 being levied.

## **12 Electrical Safety**

### **Generally**

- 12.1 All engineers working on electrical installations will be NICEIC registered and must provide proof of their registration prior to being allowed to undertake any works for LBH.
- 12.2 NICEIC registration will be validated by LBH.
- 12.3 All contractors undertaking electrical works must provide relevant insurance and indemnities prior to starting works which.
- 12.4 All engineers visiting residents properties must show resident both their personal identification card and NICEIC registration card prior to starting works.
- 12.5 All engineers entering residents homes will be DBS checked prior to commencing works for LBH.

### **Inspections**

- 12.6 The Landlord and Tenants Act requires landlords to ensure electrical systems are maintained safely throughout a tenancy but does not provide guidance on inspections intervals.

- 12.7 BS7671 – Requirements for Electrical Installation, recommends inspections of domestic electrical system not later than 10 years since the last inspection. LBH will meet this standard as a minimum.
- 12.8 However, legislation has been introduced which require all private rented accommodation to have an electrical inspection no later than 5 years from the previous inspection, however it is silent on registered providers, although it is likely that this will be extended in the future.
- 12.9 LBH will adopt the approach of undertaking inspections no later than 5 years from the date of the last inspection. This will apply to all domestic and communal electrical systems.
- 12.10 On completion of an inspection, an electronic Electrical Inspection Condition Report (EICR) will be provided to LBH and a paper copy sent to the resident.
- 12.11 Where the inspection identifies category 1 and 2 failures (those which pose an immediate risk to life) the engineer will either;
- Rectify the issue whilst on site or;
  - Decommission the system and immediately report to LBH.
- 12.12 Where a system has been decommissioned LBH will either;
- Arrange for a temporary safe supply to be provided, or;
  - Where this is not possible provide temporary alternative accommodation until the system can be repaired appropriately.
- 12.13 Where category 3 failures are identified these will be reported to LBH on the EICR and programmed in for repair or replacement accordingly;
- 12.14 For all PSL properties into which LBH place residents an inspections certificate will be required prior to taking a new property, every 5 years or at every change of tenant. LBH will undertake the inspections and re-charge the owner of the property.

### **Repairs and Maintenance**

- 12.15 Our contractors will attend to break down and repairs in line with the timescales given in our repairs policy.



12.16 It may be necessary to partially decommission individual circuits to a property where there are safety issues which cannot be immediately resolved, where this is the case LBH will either:

- Ensure the remaining circuits are safe and can provide sufficient outlets for the continued safe use of the property, or;
- A temporary safe supply will be provided, or;
- Where this is not possible provide temporary alternative accommodation until the system can be repaired appropriately.

### **New Installations**

12.17 Where a system is identified as Beyond Economic Repairs (BER) or is due for replacement under the Decent Homes standard it will be replaced in full. Residents will not be allowed to refuse this work.

12.18 All new installations will conform with current building regulations and the latest version of the Electrical safety regulations. Generally, new installations will be surface mounted in an appropriate trunking system.

12.19 The installer must be part of an accredited certification scheme and inform local Building Control of the new installation.

12.20 On completion of a new installation an Electrical Inspection Condition Report (EICR) will be provided to LBH and the resident.

### **Works by tenants**

12.21 Where tenants have undertaken works to the electrical system or installed their own fittings these will be tested as part of the inspection. Where these are found to be unsafe or do not conform to current standards they will be removed and the system made safe. LBH reserves the right to recharge residents for these works.

12.22 Residents are not permitted to undertake any unauthorised electrical works such as bypassing electrical meters, running temporary supplies from risers etc.

12.23 Electric scooters cannot be charged by running extension cables from inside flats to scooters in communal walkways. See the Scooter Policy.

12.24 Communal sockets are not installed for general use by residents. Where residents wish to use communal supplies for events such as garden parties, etc. permission must be sought and granted from LBH whom will conduct relevant risk assessments. Residents will be required to contact the Housing Compliance team or their Housing Officer to seek permission.

### **Void properties**

- 12.25 For all void properties, at the commencement of the void period LBH will test the electrical safety of the system (EICs) to ensure operatives can work safely in the property and to assess whether the system should be upgraded as part of the void works.
- 12.26 Where electrical system are deemed to have 3 years or less remaining life these will be replaced when the property is void.
- 12.27 At the end of the works period the system will be retested and a certificate provided to both LBH and the incoming resident, the next inspection will be no later than 5 years from the recommissioning of the appliance.

### **Mutual Exchanges properties**

- 12.28 LBH will ensure an inspection has been completed and certification provided to both LBH and the incoming resident at each mutual exchange.

### **Portable Appliance Testing (PAT)**

- 12.29 LBH will undertake annual testing to portable appliances in communal areas of LBH properties which are LBH responsibility to maintain.
- 12.30 LBH will not PAT test appliances to individual domestic properties unless the appliance has been provided by LBH and is has been agreed that it should be maintained by LBH.
- 12.31 Items which fail the test will be removed immediately and either repaired where practicable or replaced.

### **Lightening Protection Testing**

- 12.32 LBH will undertake annual continuity checks to lightening protections systems installed in properties. Any cat 1 failure will be dealt with immediately; cat 2 and 3 failure will be reported back to LBH for action.

## **13 Lift Safety**

### **Generally**

- 13.1 All works and servicing to lifts will be undertaken by qualified lift engineers who hold and NVQ3 in lift engineering as a minimum.
- 13.2 Any engineers undertaking work will be expected to put in place relevant isolation and safety measure to prevent unauthorised use whilst works are taking place and ensure residents and occasional users of the building are fully informed during the works.
- 13.3 Where possible lifts will be programmed to return to ground automatically in the event of a fire or alternatively Fireman's Switches will be installed which allow for manual intervention by the fire brigade to ground lift cars.
- 13.4 All lifts will have a working emergency call system.

### **Servicing**

- 13.5 All lifts will be fully serviced annually, and a maintenance check will be undertaken each month. Where any significant issues are identified lifts will be immediately decommissioned and be reported to LBH.
- 13.6 Notices will be provided to inform residents of decommissioned lifts and approximate time for repair.
- 13.7 Where low risk works are identified these will be reported to LBH and put onto a planned works programme.
- 13.8 Where lifts are to be decommissioned for more than 2 working days and no practicable alternative is available LBH housing officers will engage all residents affected and put in place appropriate support plans

### **Insurance Inspections**

- 13.9 All lifts will be subject to a 6 monthly inspection regime by LBH insurer. Report will be provided within 28 days and any works required will be actioned.

### **Break down and Repairs**

- 13.10 All breakdowns, including out of hours, which involve a person trapped in a lift will be attended within 4 hours.
- 13.11 Where a lift breakdown is reported, but no one is trapped, contractors will attend within 4 hours to identify the fault, or if reported out of hours the next working day.

### **New Installations**

- 13.12 All new lifts to be installed should, where practicable, be full firefighting lifts able to be used to access the building by the fire brigade in the event of a fire. Where this is not practicable it must be noted in the building case file and appropriate information provided to the fire brigade.

## **14 Legionella**

### **Generally**

- 14.1 This legionella policy applies to communal water systems in general needs properties, sheltered schemes and any other water supplies and storage to communal areas; it does not apply to individual domestic properties.
- 14.2 All assessments will be undertaken by qualified assessors who are members of the Legionella Control Association.
- 14.3 All engineers entering residents homes will be DBS checked prior to commencing works for LBH.

### **Risk Assessments**

- 14.4 LBH will undertake risk assessments for all relevant properties every 2 years in line with the L8 Approved Code of Practice.
- 14.5 All works and testing regime will comply with HSG274 Part 2: The control of legionella bacteria in hot and cold water systems.
- 14.6 This will identify potential sources of risk and their potential harm, reflecting on the both the use of the building and its occupancy type.
- 14.7 All actions which are identified will be undertaken with the timescales identified in the risk assessment.
- 14.8 LBH principle mitigation approach, where practicable, will be to remove items posing high risk; however where this is not possible appropriate action plans for mitigation will be put in place.

### **Monitoring Regime – Communal systems and Sheltered Schemes**

- 14.9 LBH will ensure a monitoring regime is in place as identified in the risk assessment, as a minimum the following regime will be followed unless the risk assessment identifies the need for an enhanced approach.

Frequency	Task
Annual	Water testing Thermostatic Mixing Valve temperature testing
Half yearly	Inspections of Communal Tanks and Cylinders
Quarterly	Shower Head Cleaning in sheltered schemes
Monthly	Outlet Temperature Checks
Weekly	Flushing of outlets

- 14.10 A record of all monitoring will be kept at each site and updated after each activity; all failure will be reported to LBH.
- 14.11 Contractors will provide a full action plan for dealing with testing failures, recommendations for all remedials will be carried out by qualified assessors.
- 14.12 Weekly flushing will be undertaken by LBH officers in sheltered schemes.
- 14.13 All other monitoring regimes will be undertaken by external contractors who must be UKAS accredited.

#### **New Installations**

- 14.14 All new installations will be designed to eliminate the risk of legionella where possible in line with HSG274 part 2.
- 14.15 The use of stored water approaches will be considered of last resort.
- 14.16 All systems will be designed to allow for adequate testing points and appropriate dosing systems.

#### **Void properties**

- 14.17 Individual properties which will be void for more than 2 weeks after any works have been completed, or are to remain void ahead of regeneration will either;

- Have the incoming water mains isolated and the water systems will be fully drained down, or;
- The property will be subject to a weekly flushing regime.

## **15 Governance and Assurance**

- 15.1 In order to provide overview and governance of compliance a Housing Compliance board has been created, chaired by the Director of Housing. All operational matters will be reported to this board and it will be responsible for ensure continued compliance with this policy.
- 15.2 This group will report upwards to both SLT and corporate H&S performance board, the full terms of reference are provided at appendix 1.
- 15.3 A full suite of KPIs will be provided to the Compliance board, SLT and Themedboard on a monthly basis which will show our compliance position across all areas, any programmes which are working towards full compliance and action plans which will demonstrate actions being taken to attain and remain fully compliant.
- 15.4 The KPIs will not only provide the compliance position but also actions which flow from risk assessments to ensure no actions go past their due date. The full report is shown in appendix 2, any changes will be approved by Compliance Board
- 15.5 We will undertake internal/external audits in line with the corporate plan
- 15.6 We will engage an external expert to provide support to the Cabinet which will ensure they are able to understand and fully scrutinise the data being presented to them
- 15.7
- 15.8 This policy will be reviewed every three years or at any significant change in relevant legislation.
- 15.9 Bi-annually the policy and management plan will be reviewed by an independent external expert to ensure continued compliance with legislation and best practice.

## **16 GDPR & Data Protection**

The London Borough of Havering shares the commitment to ensure that all data is:

- processed lawfully, fairly and in a transparent manner
- collected for a specific and legitimate purpose and not used for anything other than this stated purpose, or as provided for in our privacy and fair processing notices
- relevant and limited to whatever the requirements are for which the data is processed
- accurate, and where necessary, kept up to date. Any identified inaccuracies will be amended or removed without undue delay
- stored for as long as required, as specified within the London Borough Of Havering's Records Retention policy
- secured with appropriate solutions, which protect the data against unauthorised or unlawful processing and accidental loss, destruction or damage

For further information about the Council's commitment to the General Data Protection Regulations (GDPR), visit the Council's website at [Havering data protection.](#)