

COMPLIANCE SAFETY POLICY



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1. BACKGROUND AND PURPOSE

- 1.1. The purpose of this policy and associated management standards is to ensure that CHL consistently deliver safe, effective property related compliance services for residents which meet regulatory and legal requirements.
- 1.2. This umbrella policy for all Property Safety Compliance Services aims to achieve the following outcomes in line with our Corporate Strategy, purpose and vision of keeping our customers and colleagues safe and ensuring safe, high-quality and affordable homes, external environments and communities:
 - Safe homes, communal areas and estates for our residents and a safe working environment for our employees and contractors.
 - Meeting legislation and regulation as a minimum and achieving best industry practice where CHL can.
 - Providing assurance to external and internal customers that our approach to managing fire electric, gas, asbestos, water hygiene, lifts, radon and environmental compliance is fit for purpose.
 - Consistency and clarity on how the standards will be delivered to all property related services.
 - Effective performance management arrangements to ensure that the Standards set are being met. Performance information against targets set is provided to CHL Board, Cornwall Council and residents.
 - Raised awareness and ownership within both our resident and employee groups.
 - Clarity around ownership and accountability so that services are delivered effectively.
 - Fit for purpose data, systems and processes in place to ensure that the workflow is efficient.

2. SCOPE

- 2.1. This policy covers all Cornwall Housing LTD (CHL) managed stock, and rented properties managed on behalf of others where CHL provide one or more of the defined Property Compliance Services detailed in Section 3 below. It also applies to an Agent providing defined compliance services on CHL's behalf.



3. ABOUT THIS POLICY

- 3.1. CHL are committed to the safety of residents, employees and contractors. This policy is designed to achieve this goal by delivering Safety Compliance Services that consistently meet legal and regulatory requirements and delivers services in line with the regulatory standard for landlords. Where possible CHL will aim to achieve what is considered to be industry best practice.
- 3.2. To help us achieve this objective CHL has developed a range of Safety Management Standards, which define what will be delivered on each Property Compliance Service activity. These Standards explain who is responsible for delivering the service and detail how frequently CHL expect to carry out specific activities in residents' homes, in communal areas and on estates.
- 3.3. The Standards are supported by clear procedures and instructions to ensure that work streams are delivered consistently by our internal teams and by specialist contractors. Here is the agreed framework:



4. WHAT THE STANDARDS COVER

4.1. CHL have developed Management Standards around the property compliance activities considering the level of risk involved and the scope or complexity of regulation and legislation associated with delivering the service.

- **Fire Safety Management** – servicing, inspecting and maintaining fire protection and detection equipment, undertaking fire risk assessments in properties that has communal or shared areas, managing the works arising from fire risk assessments, providing advice and assurance to residents and teams around fire safety.
- **Gas & Heating Management** – maintaining and regularly servicing gas, oil solid fuel and all renewable heating appliances and ensuring access against the prescribed timeframes.
- **Electrical Management** – undertaken tests, inspections and remedial works of communal areas and individual homes within prescribed timeframes, including ongoing maintenance and portable appliance testing.
- **Asbestos Management** – completing surveys and re-inspections on homes and communal areas known to contain asbestos, arranging tests, management and removals, where appropriate and ensuring training and awareness of employees/contractors.
- **Legionella & Water Hygiene Management** – ensuring that our homes are safe through regular checks and flushing regimes and also undertaking checks on domestic properties on a risk-based approach.
- **Passenger lift & stairlift Management** – servicing, inspecting and maintaining all kinds of lifts in communal areas and resident's individual homes.
- **Radon Management** - maintaining a radon testing programme, installation of radon remediation systems and ongoing servicing and inspection of all radon remediation systems.
- **Private Drainage (Waste Water) Management** - maintaining and regularly servicing waste water systems and the ongoing remediations to ensure they are fully compliant with Environmental Permitting Regulations.
- **Waste Management** – ensuring Cornwall Housing discharges its duty of care for waste management and all contractors working on behalf of Cornwall Housing adhere to the relevant waste regulations, including waste carriers licences and maintaining accurate documentation.



- **Biodiversity Management** – Outlining specific approaches for protecting and enhancing nature. Biodiversity can be defined as all the different types of life in a given area.
- **Waste Management** – Outlines the specific approaches to waste management activities. Waste in any form has the potential to cause harm to both people and the environment.
- **Pollution Prevention Management** - outlining specific approaches for preventing pollution. Pollution is the addition of any substance (solid, liquid, or gas) or any form of energy (such as heat, sound, or radioactivity) to the environment at a rate faster than it can be dispersed, diluted, decomposed, recycled, or stored.

4.2. The Standards do address all the services where the risks are considered the highest, where regulation and legislation is most complex and where the most significant resources are deployed. All other compliance services are delivered in line with the principles enshrined in this policy. Additional Standards may from time to time be added to the framework described above.

5. THE STANDARDS' CORE PRINCIPLES

- 5.1. There are a number of key requirements, enshrined in this policy, that are common to all Property Safety Standards:
- The person or teams responsible for delivering the specific service are clearly defined as set out the Compliance Safety Management Plan Appendix A. This ensures ownership and a clear point of contact.
 - CHL focus on the importance of ensuring that our contractors and specialist contractors, when used, have the necessary skills, knowledge, experience and accreditation to carry out the work. CHL want all specialist work to be done correctly and CHL will check that employees and sub-contractors are competent.
 - Contract management by suitably qualified staff.
 - CHL ensure employee awareness by providing training and refresher guidance to all those who “need to know”. A training plan is in place to ensure that this is delivered in a structured manner.
 - The Management Standards are designed to provide an easily read overview of each service to a broad audience. They are published on our web site.
 - Each Management Standard has a range of service delivery targets, used internally to check how well CHL are achieving the standard. These are scrutinised monthly by teams and board as well being published annually to residents and the Social Housing Regulator.



- Where practicable, CHL will involve residents in designing, reviewing and influencing the Management Standards.
- CHL make and agree appointment times directly with residents when access is needed to their homes and confirm the agreed times.
- CHL are acutely aware that access to homes is critical to achieve full compliance on specific services. CHL have firm, clear arrangements in place to ensure that access is achieved where this has been problematic. The ultimate sanction will be to seek access through legal means.
- CHL aim to provide value for money on the services CHL deliver. CHL constantly review all our contractors' performance and costs against agreed terms and conditions of the contracts.
- All complaints about resident safety are escalated to the relevant manager immediately and monitor complaints about health and safety issues.
- The safety of our residents is paramount. CHL regularly survey residents on how safe they feel in their homes and will act on the findings of these surveys.

6. OUR CUSTOMERS' RESPONSIBILITIES

6.1. Customers play a really important part in helping us to keep homes and communal areas safe for families, visitors and neighbours.

6.2. CHL will ask our customers to:

- Keep their appointment or let us know in advance.
- Allow us access when CHL make a reasonable request.
- Make sure an adult is at home if there are young people in the property.
- Keep communal areas free from items that may block the means of escape in the event of a fire.
- Regularly check the detectors at home.
- Read information provided on customer safety.
- Report any concerns relating to their personal safety affected by the condition of the property or block where they live.

7. DEFINED RESPONSIBILITIES

7.1. This Compliance Policy provides an appropriate framework that enables Cornwall Housing to manage all aspects of compliance in line with legislative and regulatory requirements and sets out the defined roles and responsibilities.



- 7.2. **Leadership Responsibilities:** The Executive Director of Asset Management is accountable to Board for property compliance. Duties and responsibilities sit across all parts of the organisation and at all levels.
- 7.3. **Landlord's Authorised Person:** For each area of compliance, the Executive Director of Asset Management will appoint a Landlord's Authorised Person who will be named in the relevant management plan or standard.
- 7.4. **Delivery Duty Holder:** The Landlord's Authorised Person for each aspect of compliance may appoint one or more delivery duty holders.
- 7.5. **Quality & Efficiency:** The Quality & Efficiency team support Cornwall Housing to deliver its compliance safety duties. CHL are committed to delivering quality services to all residents.

8. MONITORING AND REVIEW

- 8.1. CHL are fully committed to ensuring that the Safety Compliance Policy and Standards are fit for purpose, refreshed regularly, and challenged against the latest changes to regulation and best practice.
- 8.2. Performance against delivery of these standards will be reported to the Board in line with the assurance framework. Performance against key standards will be reported to our customers through the annual report and available on our website.
- 8.3. The policy will be reviewed every three years through our Service Improvement Group (SIG) and Tenants Forum and more frequently if there are major changes to either regulation or legislation.
- 8.4. The standards will be reviewed annually by Delivery Duty Holders. This review will include a summary of performance against the agreed standard measures.
- 8.5. The policy and standards will be made widely available to customers and stakeholders via an appropriate range of online and printed communication platforms.
- 8.6. CHL will review customer feedback and identify areas for service improvement on a continuous basis in order to improve performance and to prioritise our work.



9. REFERENCE DOCUMENTS

Legal Influences on this policy

9.1. This policy has been written with regards to the following:

- The Regulator of Social Housings Consumer Standards
- The Housing Act 2004
- The Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Gas Safety (Installation and Use) Regulations 1998 (GSIUR) as amended.
- The Regulatory Reform (Fire Safety) Order 2005
- The Electricity at Work Regulations 1989
- The Control of Asbestos Regulations 2012
- The Control of Substances Hazardous to Health Regulations 2002
- The Control of Legionella Bacteria in Water Systems (ACOP L8)
- The Provision and Use of Work Equipment Regulations 1998 (PUWER 98)
- The Lifting Operations & Lifting Equipment Regulations (LOLER) - L113 (Second edition) Published 2014
- The Construction Design and Management Regulations 2015
- Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- The IEE Wiring Regulations BS 7671
- The Electricity Supply Regulations 1998
- The Housing Health and Safety Rating System. (HHSRS)
- Heating Equipment Testing and Approval Scheme (UK) -(HETAS)
- Disability Discriminations Act 2005
- The Equality Act 2010
- Part M of the Building Regulations
- The Fire Safety Act 2021
- Control of Pollution Act 1989
- Landfill (England and Wales) Regulations 2002
- End-of-Life Vehicles Regulations 2003
- Hazardous Waste (England and Wales) Regulations 2005
- Waste (England and Wales) Regulations 2011
- Controlled Waste (England and Wales) Regulations 2012
- Waste Electrical and Electronic Equipment Regulations 2013
- Environmental Permitting (England & Wales) Regulations 2014
- Environmental Permitting (England and Wales) Regulations 2016
- The Public Health Act 1936
- The Water Resources Act 1991



- Waste (England and Wales) Regulations 2011
- Environmental Permitting (England & Wales) Regulations 2014
- Environmental Permitting (England and Wales) Regulations 2016

APPENDIX 1 – LANDLORDS AUTHORISED PERSON AND KEY ROLES

Compliance Area	Landlords Authorised Person	Name	Appointed
Asbestos	Head of Building Safety	Mark Statton	01/6/2023
Radon	Head of Building Safety	Mark Statton	01/6/2023
Fire Safety	Head of Building Safety	Mark Statton	01/6/2023
Electrical Safety	Head of Building Safety	Mark Statton	01/6/2023
Gas and Heating	Head of Building Safety	Mark Statton	01/6/2023
Water Hygiene and Legionella	Head of Building Safety	Mark Statton	01/6/2023
Lifts and Lifting Equipment	Head of Building Safety	Mark Statton	01/6/2023
Private Waste Water systems	Head of Building Safety	Mark Statton	01/6/2023
Waste and Environmental	Head of Building Safety	Mark Statton	01/6/2023
Compliance Area	Delivery Duty Holder	Name	Appointed
Mechanical , Electrical and Water Hygiene	M&E Manager	Chris Gove	25/09/2023
Fire Safety	Fire Safety Manager	Martin Mellor	01/11/2022
Asbestos and Radon	Asbestos Compliance Manager	Geraint Jenkins	13/03/2023
Private Waste Water systems, Waste and Environmental	Environmental Compliance Manager	Tanya Saker	01/05/2023
Building Safety	Building Safety QCC Supervisor	Susan Holford	12/09/2022



APPENDIX 2 - DEFINED RESPONSIBILITIES

The Landlord's Authorised person is the person who is responsible for:

- Ensuring that CHL have a robust standard.
- Agreeing and maintaining the management plan, procedures and processes.
- Ensuring that an appropriate budget is agreed to deliver full compliance with the standard.
- Recommending performance targets to the Executive Director of Asset Management and Executive Leadership Team.
- Developing a programme of works to deliver the standard.
- Monitoring and ensuring effective delivery of the standard.
- Acting as Data Manager and ensuring that the data held by Cornwall Housing is robust and up to date.

Delivery Duty Holder

The Landlord's Authorised Person for each aspect of compliance may appoint one or more delivery duty holders.

The delivery duty holder is the person who has responsibility for:

- Drafting operational procedures and processes
- Maintaining all accreditation, certification and registration
- Delivering compliance to the agreed standard, programme and targets
- Agreeing servicing schedules and programming
- Providing technical support and advice to the Landlord Authorised Person
- Procurement / contractor selection (where required)
- Purchase/works orders and contractor management (where required)
- Ensuring work undertaken by external contractors meets the agreed standards
- Material Specifications
- Undertaking Incident Reviews

Building Safety Team

The Building Safety Team support Cornwall Housing to deliver our compliance safety duties by:

- Providing audit, reporting and assurance activities.
- Maintaining an up-to-date library of operational procedures and processes.
- Maintaining all records for accreditation, certification and registration.
- Monitoring and reporting on delivery against our programme.



- Monitoring compliance with agreed operational procedures and processes.
- Supporting the delivery team in communication with customers.
- Co-ordinating legal actions to enforce compliance where require.

Delivery Team

The delivery team are responsible for:

- Ensuring contractors undertaking works have the appropriate certification and training.
- Compliance with operational procedures including compliance with legislation and regulatory standards.
- Delivering services in line with the agreed standards, programme and targets.
- Customer communication / liaison.
- Updating systems.
- Procurement / contractor management and selection (where required).
- Purchase/works orders and contractor management (where required).
- Undertaking the agreed quality checks – 5-10% of all areas of work.
- Undertake Health & Safety inspections on all contractors and review any reported incidents.



DIVERSITY & INCLUSION

CHL are committed to treating all people with fairness and respect. CHL aim to create an inclusive environment where people are treated with dignity, inequalities are challenged, and CHL anticipate and respond positively to different needs and circumstances to enable individuals to achieve their potential and foster good relations within the communities served. CHL want to be recognised as an organisation delivering fair, inclusive, accessible services and an employer and partner of choice.

When applying this policy, CHL act sensitively towards the diverse needs of individuals and to reduce discrimination and harassment by making reasonable adjustments such as:

- eliminating discrimination – by providing support to those who need it and information in accessible formats and languages on request.
- tailoring the policy to meet both the specific needs of the individual, including those with additional support needs, and the diverse needs of the wider community.
- advancing equality of opportunity – treating all tenants fairly.
- fostering good relationships – listening to customers and responding appropriately.
- compliant with all aspects of Equality & Diversity legislation, and specifically the Equality Act 2010.



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Alternative formats:

If you would like this information on audio CD, audio tape, Braille, large print, any other format or interpreted in a language other than English, please contact info@cornwallhousing.org.uk

