

Unipol Student Homes
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Health and Safety Policy for Housing

unipol

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the home of student housing

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Introduction

This health and safety policy applies to all of Unipol's housing portfolio. This includes all dwellings owned, leased or managed by Unipol.

Unipol currently houses around 2,700 tenants. The tenant base is diverse and includes international students, first year allocated students, students with dependents (mainly families) returning undergraduates, postgraduates, postdoctoral students and a few University staff.

Unipol currently has 649 dwellings within its portfolio and tenants are housed in a diverse portfolio ranging from small houses (referred to as off street properties), flats, listed buildings and new build accommodation, Unipol's smallest dwelling consists of a small house for a couple and its largest building has 447 students in 95 shared cluster flats.

Part of this policy relates to legislative compliance and its interpretation, other parts relate to matters that exceed the legislative minimum, some of which can be found within the various Codes that Unipol has voluntarily joined (these include membership of its own Unipol Code, the Leeds Landlord Accreditation Scheme (LLAS) and the ANUK/Unipol Code of Standards for Larger Residential Developments).

In line with current legislative and policy development Unipol's approach to Health and Safety (whilst maintaining its statutory legal obligations) relies on a risk based health and safety method which identifies hazards, apportions risks to those hazard outcomes and seeks, wherever possible, to minimise those risks within the bounds of practicability.

Within health and safety routines considerable weight has been placed on the integration of certain core routines into the property inspections carried out by dedicated housing management staff.

The Legislative Environment

There are a number of important sources that Unipol uses to determine the legislative environment within which it works in respect of health and safety, which are:

The Housing Health and Safety Ratings System

The condition of all housing is subject to Part 1 of the Housing Act 2004 and the evidence based risk assessment process of the Housing Health and Safety Rating System (HHSRS), on which local authorities now base enforcement decisions. This applies to all types of residential premises, whether or not any amenities are shared.

HHSRS risk assesses twenty-nine categories of housing hazard. Technical assessment is a two-stage process, addressing first the likelihood of an occurrence and then the range of probable harm outcomes. These two factors are combined using a standard method to give a score in respect of each hazard.

HHSRS does not provide a single score for the dwelling as a whole or, in the case of multiply occupied dwellings, for the building as a whole.

Hazards are scored in bands, from band A, the most severe, to band J. Category 1 hazards are those rated in bands A-C. Category 2 hazards are those rated band D and lower.

Category 1 hazards trigger a local authority's duty under section 5 of the Act to take the appropriate enforcement action.

Licensing Under Part II of the Housing Act 2004

Standards in respect of management, amenity level and health and safety matters are required when houses in multiple occupation require a licence. The definition of house in multiple occupation (HMO) is contained in section 254 of the Housing Act 2004. The definition is complex, and for detailed understanding then the Act itself should be studied. For Unipol's purposes, however, the key definition of an HMO is that the living accommodation is occupied by persons who do not form a single household.

The categories of HMO which fall within mandatory licensing are prescribed in The Licensing of Houses in Multiple Occupation (Prescribed Descriptions) (England) Order 2006. These are all HMOs comprising three storeys or more and occupied by five or more persons living in two or more separate households.

Whilst shared houses fall within the legal definition of an HMO and are licensable, it is recognised that they can often present a lower fire risk than traditional bedsit-type HMOs due to their characteristics.

Unipol lets both individual rooms in houses and flats and also lets houses and flats on a shared basis normally between occupants who rent the whole house on a joint tenancy.

Local Government Regulation (formerly LACORS) Housing - Fire Safety Guidance on fire safety provisions for certain types of existing housing

Fire safety within the home is an extremely important issue, especially in mixed use premises and where unrelated occupiers, who live independently from one another, share common areas of the same building. This area of law is covered by both the Housing Act 2004 and the Regulatory Reform (Fire Safety) Order 2005.

This guidance helps to manage the relationship between the Housing Act 2004 and the Fire Safety Order by offering advice and assistance to enforcers, landlords, managing agents and tenants, amongst others, on ways to make residential buildings safe from fire, regardless of which piece of legislation is relevant.

At its core, this guidance also relies on carrying out a fire risk assessment to ensure that a property has adequate and appropriate fire safety measures in place.

The guidance also takes into account the impact of the Regulatory Reform (Fire Safety) Order 2005 which imposes a legal obligation to carry out a formal risk assessment of the common parts of a property when the property is let on a shared occupancy basis.

The guidance applies to all types of property except (in respect of Unipol's portfolio) purpose built halls of residence and properties or those dwellings constructed or converted to a standard in compliance with the Building Regulations 1991 or later.

Framework for the Health and Safety Policy

A risk based approach to health and safety is based on an HHSRS assessment of each individual property. That risk assessment, however, falls within various categories reliant upon the type of property and the nature of its occupation.

In order to simplify Unipol's health and safety approach, health and safety policies are based on the following categorisation:

- a house or flat in multiple occupation
- a house or flat occupied by persons forming a single household.

Where no explicit distinction is made between these categories in the policy, a common policy applies to both categories.

In the case of fire safety a third category is added relating to shared houses:

- a house or flat in multiple occupation
- *a house or flat in multiple occupation where the whole property has been rented out by an identifiable group of student sharers - a shared house*
- a house or flat occupied by persons forming a single household.

A shared house, for the purposes of this policy is an HMO where the whole property has been rented out by an identifiable group of student sharers as joint tenants. Each occupant has their own bedroom but they share the kitchen, dining facilities, bathroom, WC, living room and all other parts of the house. All the tenants will have exclusive legal possession and control of all parts of the house, including all the bedrooms. They will, in the main, have rented out the house as one group. There is a single joint tenancy agreement.

Again, where no explicit distinction is made between these categories in the policy, a common policy applies to all three categories.

Gas Safety

The annual testing and approving of all gas appliances and installations (cookers, gas heaters, gas fires, hot water and heating boilers and associated pipe work) is set out within a regulatory framework. All properties are tested annually for gas safety purposes in accordance with the Gas Safety (Installation and Use) Regulations 1994.

Following satisfactory inspection, the pass certificates are returned to Unipol where they are kept on file by property. Every tenant receives the current copy of this certificate when they collect the keys for their property and an updated copy (if issued within the tenancy) is sent to the property when received. Gas servicing is generally carried out in summer and autumn.

Each gas safety certificate is completed and signed by a Gas Safe registered engineer and the certificate displays the Gas Safe Register logo and registration number of the engineer clearly.

Certification details are logged in a Health and Safety Database to ensure that all relevant properties comply with these requirements.

Gas safety is further increased by Unipol using, where permitted Gas combination and (for newer appliances) condenser boilers rather than separate water and space heating. This reduction in the number of gas appliances provided within a property automatically reduces the risk of a fault occurring.

In buildings with 5 or more stories only electric appliances are used.

Gas Cookers and Flame Supervision Devices (FSDs)

In 2008 the Institute of Gas Engineers and Managers issued IGE/G/5, recently clarified in a CORGI Technical Bulletin 218 which gave guidance that has to be followed by registered gas fitters. The guidance relates to cookers and flueless gas water heaters but Unipol no longer has any separate or flueless gas water heaters in its portfolio.

The guidance requires that all new cookers fitted after 1st January 2008 have to be fitted with FSDs. Only a limited range of cookers can be fitted because most cookers do not have such devices built into them. As time goes by the range of appliances with FSDs is increasing. Appliances with FSDs all need an electricity supply to operate the FSD and in many cases, where such an appliance is needed, an additional power socket is required for this purpose.

The guidance applies to a variety of types of building, but for Unipol's purpose, it primarily applies to buildings containing a number of individual dwellings used for domestic purposes. Unipol has a number of blocks of flats with gas cookers and the guidance applies to these. Unipol also has houses which are subdivided into flats or bedsits which contain a number of separate kitchens and gas appliances where this guidance may apply (depending on how those kitchens are supplied with gas).

For ease of interpretation when Unipol replaces any cooker with a new appliance in any building where there is more than one kitchen (with each of those kitchens containing a gas cooker) it fits an appliance fitted with an FSD. When fitting a new appliance requiring a new electrical supply it fits a

dedicated power socket for that electrical supply, normally behind or adjacent to the cooker. Existing power sockets fitted above a work surface are not used to stop trailing cables running close to working surfaces.

In some cases, Unipol replaces non working appliances from its store of existing appliances. The guidance makes it clear that second-hand and previously used cooking appliances can still be fitted without requiring FSDs. Only new appliances are affected.

Unipol will have a database from November 1st 2010 showing where FSD appliances have been fitted throughout its portfolio (for monitoring purposes) and uses only reputable contractors who operate within the guidance issued.

Electrical Safety

Many of the relevant regulations dealing with electrical safety and installation refer to "a *Competent Person*" and this means, an electrician that has been approved by a government-approved scheme as sufficiently competent to self-certify that its work complies with the Building Regulations Part P (Design and Installation of electrical installations) and is designed, installed, inspected and tested to the standard required by BS 7671.

The predominant regulations affecting electrical safety and standards are the current Institution for Electrical Engineers Wiring Regulations, BS7671: 2008 (as updated), the Electricity at Work Regulations 1989 and the Health & Safety at Work Act 1974. Electrical testing has to be carried out by a Part 'P' registered Competent Person.

There is a statutory requirement that all HMOs (both licensable and not licensable) must have their mains installation inspected every five years, by a person qualified to undertake such inspection and testing and a certificate provided by that person specifying the results of the test. The standards set for non HMO rented accommodation are recommendations only and the Health & Safety at Work Act deals solely with obligations for employees with some effect on residential accommodation where employment liabilities are incurred.

Unipol ensures that electrical safety within its property portfolio is maintained in a number of ways:

a) All *new electrical installations* are certified as safe by a professionally competent electrician, preferably one that is registered with NICEIC. An Electrical Installation Certificate (compliant with BS 7671) is handed over by the contractor or developer for property and landlord supply within 12 weeks of the building being completed. In a development partnership Unipol includes legally binding clauses that if certificates to the required standard are not received within the 12 week time frame then Unipol will commission its own certification at the expense of that partner.

The certificates are kept in the Unipol office and tenants are able to view the documentation if they request to do so.

b) For *existing installations* a periodic electrical testing and inspection regime is carried out for each dwelling and landlord supply. A report is issued by a professionally competent electrician which provides an overall summary of the electrical fixed wiring system's compliance with relevant regulations and an assessment that the installation is satisfactory and, if unsatisfactory, outlines what work is required.

Test Result certificates for every property are kept in the Unipol office and tenants are able to view the documentation on request

Periodic Inspection and Testing takes place on all of Unipol's properties, whether HMOs or not, every five years (unless a Report recommends a shorter interval in which case the recommended interval is used for the next inspection).

c) *Minor Works* take place frequently within the portfolio. Following certain minor alterations or additions to existing electrical wiring systems within the property portfolio a Minor Works Certificate to BS 7672 is obtained and filed in the Unipol office.

Minor Works Certificates are not obtained for every adjustment or replacement made as part of an existing electrical installations and these are checked within the periodic inspections routine outlined. Examples of work where a Minor Works Certificate is not required are:

- replacing accessories such as socket-outlets, control switches and ceiling roses
- replacing the cable for a single circuit only, where damaged, for example, by fire, rodent or impact
- re-fixing or replacing the enclosures of existing installation components
- providing mechanical protection to existing fixed installations
- installing or upgrading main or supplementary equipotential bonding
- work that is not in a kitchen or special location and does not involve a special installation and consists of adding lighting points (light fittings and switches) to an existing circuit. adding socket-outlets and fused spurs to an existing ring or radial circuit.

Minor Works Certificates are obtained where more substantial electrical additions and adjustments have taken place and where Part P to the Building Regulations 2005 applies. Examples of works where Unipol will require a Minor Works Certificate would be:

- alterations made in "wet" area (kitchens and bathrooms)
- fitting of new (but not replacement) extractor fans in wet areas
- wiring connected to installation of new central heating boilers
- significant changes to the installation.

d) Unipol also *assesses electrical safety* as part of carrying out its *housing management inspection routine*. Inspections occur several times within each academic year, both during and after tenancies (see 'Property Inspections' for further details.) Staff use the inspections to check the following:

- visual evidence of cracking, damage, scorching etc to socket outlets and switches
- visual evidence of damage to light fittings and free standing lamps
- visual evidence of over occupants over-loading the power outlets
- evidence of unsafe practices by tenants

Results from these inspections are noted and any electrical repair work required is commissioned from a competent electrician. Certification is required in accordance with this policy.

e) The 17th Edition of the IEE Wiring Regulations (BS 7671:2008) came into effect on the 1st July 2008. All new commercial, domestic and industrial wiring installations after that date must be designed, constructed, inspected, tested and certificated to meet the requirements of BS 7671: 2008. In some cases, where certain alterations are made to an electrical installation, that installation may need upgrading to meet the 17th Edition standard.

This has some implications on retesting, particularly relating to the extension of the requirement to provide Residual Current Devices (RCDs) on power circuits (Chapter 41) and changes to the provisions required for bathrooms (Section 701).

All properties currently use consumer units with electronic circuit breakers (generally known as Mini Circuit Breakers - MCBs) in place of ceramic and wire fuse cartridges. These trip out when an unsafe appliance or a fault on a circuit occurs and are fully re-settable once the problem has been resolved. These consumer units protect against serious damage from electric shocks from all appliances used in the property, including the majority of those appliances which belong to tenants.

In accordance with its obligations under the Unipol Code Unipol is proactively extending the fitting of RCDs in all of its HMOs and by October 1st 2011 residual current device (RCD) protection will be provided to all consumer units.

Portable Appliance Testing (PAT)

Unipol does not undertake portable appliance testing in its portfolio, unless required to do so by insurers. Where PAT testing is required certification details are logged in a Health and Safety Database to ensure that all relevant properties comply with these requirements.

Most appliances fitted by Unipol are double insulated or are not able to be tested and Unipol rents its washer/driers and their safety is a matter for the supplier.

The existing provision of implementation of MCB and more recently RCD protection throughout its portfolio is reducing the chances of electrocution or fire from unsafe appliances and that risk stems mainly from tenants' own appliances brought into the building which are outside of Unipol's obligations and control.

Visual checks on all electrical appliances are undertaken by Housing Management Staff as part of their inspection routine. Where an appliance looks to be unsafe then a free PAT is made available to the tenant. Tenants are also written to advising them to remove certain appliances from the property that might constitute a hazard.

Light Drops and Bulbs

Specialist lamps and lamps located within fittings are replaced, on request, by Housing Management staff. Where tenants are responsible for bulb replacement, light drops have been lowered to allow for ease of access.

Periodic checks are made, as part of an inspection routine, of communal areas, corridors, stairwells where bulb replacement is the responsibility of Unipol.

In communal areas illumination is provided at regular intervals so that a single lamp failing does not constitute a hazard.

Where possible, Unipol uses low energy lamps.

Components and Appliances

All appliances are installed in accordance with the manufacturers' instructions and function in accordance with manufacturers' operational limits and are capable of being operated in a safe manner. Appliances are regularly visually inspected for wear and tear and any defects remedied

Unipol does not purchase reconditioned or second hand appliances, although appliances can be relocated within the portfolio for reuse. When replacing fridge/freezers those appliances meet the A or B rating on the EU Energy Label system which primarily shows energy efficiency.

Instruction for the safe use of all electrical appliances provided by Unipol are made available in downloadable tenants information which includes a handbook and an instruction manual for the property. In some cases, where necessary 'point of information' instructions provided next to appliances or heating systems.

Fire Safety

The current standards Unipol uses for its properties are based on *Local Government Regulation (LGR) Housing - Fire Safety Guidance on fire safety provisions for certain types of existing housing* which covers obligations under both the Housing Act 2004 and the Regulatory Reform (Fire Safety) Order 2005.

This guidance does not apply to student halls of residence and the standards Unipol uses for these larger buildings are based on specific advice received from the Fire and Rescue Services in designing and running each hall, the requirements of the Regulatory Reform (Fire Safety) Order 2005 and the detailed fire safety guidance contained in the *HM Government Fire Safety Risk Assessment Sleeping Accommodation Guide*.

In all cases the guidance is interpreted locally by the West Yorkshire Fire and Rescue Service and Leeds City Council under a protocol which allocates responsibilities for fire safety between them.

Risk Assessment

The Regulatory Reform (Fire Safety) Order 2005 (also known as the RRO) makes it necessary, in certain circumstances, to carry out a specific risk assessment for fire risk.

In the case of buildings covered by the LGR Guidance it is not necessary to carry out a specified risk assessment for domestic properties or for properties rented by groups of occupants on a "shared house" basis (normally indicated by the whole house being let to a single group on a single tenancy).

A risk assessment is required when a property is let in parts on individual agreements. For Halls of Residence a risk assessment is always required.

Unipol carries out a specified risk assessment:

- on all properties where rooms are let on single tenancies
- on all larger developments which are regarded as halls of residence. *The Government Approved National Codes of Practice* (issued under Section 233 of the Housing Act 2004) definition of a "larger development" is used which is 15 or more bed spaces.
- for properties managed by Unipol the Management Agreement makes provision for such an assessment to be provided by the owner of the building to Unipol or empowers Unipol to undertake such an assessment, on behalf of the owner.

In properties where there is multiple ownership the other owner/s of the building are responsible for producing a fire risk assessment and providing Unipol with a copy of this and, in turn, Unipol will provide a copy of its assessment to them on request.

The purpose of these fire risk assessments are to:

- identify the fire hazards
- reduce the risk of those hazards causing harm to as low as reasonably practicable

- decide what physical fire precautions and management arrangements are necessary to ensure
- ensure the safety of people in the premises if a fire does start.

Assessments take the methodology recommended in *Part D* of the LGR Guidance which, in turn, is based on the methodology outlined in the HM Government Fire Safety Risk Assessment Sleeping Accommodation Guide. The risk assessment is recorded in the same format as the *Example form for recording significant findings from the fire assessment in Appendix 3* of the LGR Guidance.

All risk assessments are reviewed annually by Unipol's Health and Safety Review Board which is chaired and convened by the Housing Manager and has a membership of Unipol staff with specific responsibilities in this area.

In addition to this risk assessment, Unipol arranges for the assessment of all buildings in its portfolio under the HHSRS by a qualified Environmental Health Officer every five years. One of the 29 risk categories covered by the HHSRS survey is fire. At the conclusion of each assessment a report is produced. Further information on how Unipol uses the HHSRS information can be obtained later in Policy.

Fire Safety and Precautions

Current practice regarding student accommodation fire safety centres on compartmentalisation and automatic fire detection together with the minimisation of false alarms. All of the systems deployed through the Unipol portfolio meet or exceed the statutory requirements for fire protection.

Overall fire safety within the portfolio is achieved by a combination of detection systems, fire fighting equipment, layout design and tenant education. The integrity of these fire systems is then maintained by a structured testing and monitoring regime.

All changes to fire detection and fire fighting provision are confirmed with the WYFRS and are filed in the property's files as well as a central fire service file maintained by Unipol's Projects Coordinator.

Fire Fighting Equipment

All properties are provided with a fire blanket complying with BS EN3:1996. These are located in the kitchen of the property. Some properties also feature additional water or foam filled extinguishers to communal areas, depending on fire service advice at the time of conversion or development or as subsequently updated.

Where possible additional extinguisher equipment is not installed as following anything more than a small fire tenants should be encouraged to evacuate the building and call the fire service.

2Kg Dry Powder Fire extinguishers are fitted in the kitchens of family properties. Because of the nature of that tenant group the appliances are less likely to be subject to tamper than if installed in shared properties.

In most smaller HMOs Unipol is not required to fit fire extinguishers.

Where fire extinguishers are required, every attempt is made to avoid placing them in common areas where responsibility for tampering can be difficult to ascertain. Wherever possible, extinguishers are located within flat units where responsibility for use can be ascribed to a specific group of tenants. In some larger buildings which have CCTV any tampering with fire equipment can be identified and this is followed up in a meeting with the relevant tenant/s.

The Housing Management and Procurement Officer keeps records of the addresses and types of fire extinguishers.

Where fire extinguishers are fitted they are serviced annually and certification of such servicing, together with the remedying of any defect is kept on file. In dwellings where fire extinguishers are fitted, fire blankets are also inspected by the same servicing contractor and certification is also provided to Unipol and kept on file at the Unipol office.

In properties where fire extinguishers are not fitted, fire blanket installations are inspected annually by Housing Management Officers. All fire blankets which have tamper tags removed or appear damaged in any way are replaced.

Replaced Fire Blankets are returned to Unipol and are visually inspected to ensure that the blanket is undamaged by fire or storage. If the blanket has been damaged it is discarded, if not, it is refolded, a new tamper tag fitted and reused. Housing Management Officers record that this inspection has taken place on the Housing Management Health and Safety Database

Layout/Fire Integrity

All Unipol properties are designed or converted to ensure that the layout and fire integrity of the building is coordinated with the overall fire strategy of the property.

The basis of these strategies is to provide either

- a safe exit from the property in the event of a fire or
- a safe refuge from fire which will maintain its integrity long enough to allow the fire to burn out or for the automatic detection system to activate so that the fire service can be called to assist.

In *back-to-back houses* where the only exit route is through a high risk area (normally the kitchen) tenancies are only offered to lower risk single households (couples or a family) to remove the risk associated with shared student occupants.

Leeds City Council's *Fire Safety Principles for Residential Accommodation* has a specific set of recommendations for Back to-Back houses (both singly and Multiply occupied) and these are followed. The Local Authority also has a recommended kitchen layout in these high risk areas which ensures that any cooker is located away from entry and exit doors and Unipol has implemented this recommended layout.

Within HMOs each habitable room is given a 30 minute protection. This is achieved via standard construction methods and fitting 30 minute fire doors and where smoke detection is fitted in bedrooms

these are also fitted with intumescent strips and brushes or 25mm rebates (known collectively as "cold seals"). The integrity of these doors needs to meet BS476: Part 22: 1987 and the smoke sealing must meet BS476: Part 31.1.

Self closers are fitted on all kitchens and living rooms in line with LGR advice or where risk assessment or Building Regulations requires this. Rooms with self closers are checked as part of the housing management inspection process to ensure that doors are fully closing properly and remedial action is taken where this is not the case.

Within larger buildings additional fire protection is provided. The integrity of each individual flat unit is for either 1 or 2 hours. This compartmental approach includes protecting all ductwork which rises through the building so that fire and smoke cannot spread between floors.

Where the primary means of escape is through a kitchen or lounge area a secondary means of escape is provided through escape windows. If escape windows cannot be fitted then additional protection including sprinkler systems are used.

Fire Detection Systems

All Unipol dwellings are covered by a minimum of a mains-wired fire detection system to BS5839: 1988. The type of detection system provided depends upon the type, occupant type and layout of the property. Standards in Appendix B generally apply. Some example systems are described below but exact systems may differ from property to property.

Unipol exceeds regulatory requirements by fitting:

Family Properties

- a 30 minute fire door/s in the kitchen (with an effective overhead hydraulic self closer and with intumescent strips and cold smoke seals)
- an LD3 Grade D AFD system, which means fitting smoke detection and sounders on every level of circulation space (including stairwells, corridors and lobbies that form part of the escape route)
- interlinked smoke detection (if existing) and heat detection (if a new system) in any cellar
- an interlinked heat detector in the kitchen.

Low Risk HMOs - Up to Two Storeys & Up to 6 Occupants and Three to Four Storeys, Up to 4 Occupants

- a 30 minute fire door/s in the kitchen (with an effective overhead hydraulic self closer and with intumescent strips and cold smoke seals)
- an LD3 Grade D AFD system, which means fitting smoke detection and sounders on every level of circulation space (including stairwells, corridors and lobbies that form part of the escape route) *including the lounge*
- interlinked smoke detection (if existing) and heat detection (if a new system) in any cellar
- an interlinked heat detector in the kitchen.

Higher Risk HMOs - Up to Three to Four Storeys, 5 to 6 Occupants

- a 30 minute protected route of escape with FD30 (fire) doors to all bedrooms opening onto the route of escape
- FD30S (fire and smoke) doors fitted to kitchen and living room (with an effective overhead hydraulic
- self closer and with intumescent strips and cold smoke seals)
- an LD2 Grade D AFD system, which means fitting smoke detection and sounders on every level of circulation space (including stairwells, corridors and lobbies that form part of the escape route) including *all bedrooms and the lounge*
- interlinked smoke detection (if existing) and heat detection (if a new system) in any cellar
- an interlinked heat detector in the kitchen.

High Risk HMOs - Up to Three to Four Storeys, 7+ Occupants

- a 30 minute protected route of escape with FD30S (fire and smoke) doors (with effective overhead hydraulic self closers and with intumescent strips and cold smoke seals to all risk rooms opening onto the route of escape. Travel distance must not be excessive
- an LD2 Grade D AFD system, which means fitting smoke detection and sounders on every level of circulation space (including stairwells, corridors and lobbies that form part of the escape route) *including all bedrooms and the lounge*
- and in any cellar, and interlinked heat detection in the kitchen;
- interlinked smoke detection (if existing) and heat detection (if a new system) in any cellar
- an interlinked heat detector in the kitchen.

Flats or Bedsits in Sub-divided building where bedroom doors are not key lockable

BS5839 LD2 Grade A alarm system are deployed. Typically this features smoke detection to all communal circulation areas and main areas of individual flats with heat detectors to kitchens. All detectors are interlinked and wired back to a monitoring panel by the building front door (for easy access to the Fire Service if required). Activations logged on this system show which area of the building the activation took place.

All Larger Properties with Key Lockable Bedroom Doors

A BS5839 LD2 Grade A type system is used. This incorporates smoke detection to all common circulation areas, all flat circulation areas, all habitable rooms within flats and heat detection to kitchens. The detectors are interlinked and wired back to a monitoring panel by the building entrance. Activations on this system show which area of the building the activation took place.

Mixed Use Developments

There are a small number of developments in the Unipol portfolio which are described as “mixed use”. Mixed use as defined in the Building Regulations, Part B, is simply a building containing living accommodation together with occupancies other than residential.

In these situations Unipol undertakes a thorough fire risk assessment (taking advice from the fire and rescue authorities before complying as necessary with building regulations for this type of accommodation).

Unipol ensures that:

- separate entrances are provided to the accommodation
- appropriate measures are taken to ensure that there is both vertical and horizontal fire protection to maintain the integrity of the means of escape in accordance with BS: 5588: Part D
- any automatic fire detection system and alarm system with which the main part of the building is fitted also covers all of the accommodation. In the developments currently managed by Unipol, this will include a fully addressable fire system to BS: 5839: Part 6: Grade A: LD (2) with detection in all risk and common areas together with Emergency Lighting to BS: 5266: Part 1. In three of the developments there is also an automatic smoke extraction system
- any security measures in place will not prevent escape at material times.

Unipol will ensure that the testing regime for fire detection and emergency lighting will follow that for larger buildings as previously described.

Avoiding False Alarms

Unipol strives to ensure that fire systems are as individual to a dwelling as possible based on a risk assessment of that building. An increased sense of tenant ownership greatly decreases the occurrence of false alarms and engenders a more responsible attitude to fire safety. Successful ways of achieving this individualisation include:

- where a fire system is shared in a sub-divided building, a detector activation only triggers the alarms within that dwelling for a set period (agreed and prescribed by the fire authority). This allows the individual tenants the opportunity to reset the fire system in the event of a false alarm. If the alarm is real the system will 'cascade' or 'step' to adjacent units so evacuation can take place.
- where possible manual call points ('break glasses') are moved to final exit points within individual dwellings rather than in communal areas. This reduces malicious false alarms.
- in larger developments, systems are individualised as much as possible, often with separate mini monitoring panels being installed within individual dwellings. These are then monitored by an overall central monitoring station (in order to check for faults and false or malicious activations) that can identify persistent problems and address them.

Escape from the Property

Where the property is an HMO all external doors are fitted with a mortise lock with an internal thumb turn allowing escape from the building without the use of a key.

Testing Regimes

All properties have their fire systems tested annually to comply with BS 5839: 1988. This involves testing every detector, battery back ups and the general functioning of the system at least once a year. All tests are recorded on a database.

The testing regime is as follows:

Shared Student Flat Complexes

Fire systems are tested either quarterly or twice-yearly (depending on the size of the complex). The results are logged in test certificates which are filed at the Unipol office. The contractor is a specialist fire engineer.

In addition, a manual test of the call points is carried out on rotation by housing management staff to ensure that the system is working correctly. This also allows in-house staff to check that the control panels are not showing any faults which may have occurred since the previous contract testing. Staff also inspect means of escape on these visits. A system is in place to report that a test has taken place through the use of text messaging enabling results to be logged on computer and copied to record books quickly and accurately.

Sub-Divided Buildings

Fire systems are tested twice yearly by a specialist fire engineer. This is a higher level of servicing than for stand alone properties as the fire system is shared between dwellings so presents a higher risk. The results are logged in test certificates which are filed at the Unipol office. The contractor is a specialist fire engineer.

In 41 Cardigan Road, which is a larger subdivided building deemed to be higher risk, a manual test of the call points is carried out monthly by housing management staff to ensure that the system is working correctly. Staff also inspect means of escape on these visits.

The results are logged at the Unipol office and checked by the designated member of staff. A system is in place to report test results through the use of text messaging as above.

Stand Alone Properties with Dedicated Fire Detection Systems

These properties are serviced one a year by a specialist fire engineer. The results are logged in test certificates which are filed at the Unipol office.

Additional Visual Inspections

Housing Management staff carry out a number of checks during their property inspections (as outlined in Property Inspections).

Emergency Lighting

Emergency lighting is a self-descriptive term and is lighting for an emergency situation when the main power supply fails. The loss of mains electricity could be the result of a fire or a power cut and the normal lighting supplies fail. In larger buildings the provision of emergency lighting is an integral part of the safety regime of the building and is fitted at the time of construction or conversion.

In other off street properties emergency lighting may be required, particularly in larger HMOs, where a risk assessment identifies that a protected escape route is not provided with adequate background lighting either natural or borrowed from street lighting to ensure the safe movement of occupants to the final exit door(s). In these cases emergency lighting is fitted to address the particular risk identified.

As part of Unipol's HHSRS and RRO inspection routines, the need for emergency lighting is identified and revised on a regular basis.

Emergency lighting systems need routinely inspecting and testing in accordance with recommendations made in BS 5266 and following Lacors guidance (Local Government Regulation).

Large developments and complex houses of multiple occupation

Should be serviced and maintained in accordance with BS5266-8:2004. Complex HMO's can be described as over 5 or 6 storeys, no borrowed light, complex escape route, particular risk of vandalism.

Daily

Indicators of central power supply visually inspected for correct operation. Does not require a test of operation.

Monthly

- a) A simulation of a failure of supply to ensure all luminaires (lamps & signage) are luminated whilst in emergency mode. The period of simulation should be sufficient for the purpose of this clause, whilst minimising damage.
- b) Check that all luminaries and all lamps are clean, undamaged and the lamps are not blackened.

Annually:

- a) A full rated duration test, in accordance with the manufacturer's guidelines by a competent service engineer.
- b) The supply of normal lighting shall be restored and any indicator lamp or device checked to ensure that it is showing normal supply has been restored.
- c) The charging arrangements should be checked for proper functioning.
- d) The date of the test and its results shall be recorded.

Mill Street & Grayson Heights monthly and annual checks are carried out as part of a PPM contract. See Appendix C

Dispersed houses with normal risk

Most average sized premises with normal risk: an annual discharge test in accordance with the requirements of BS5266:8. This must be carried out by a competent person, usually a lighting engineer under a maintenance contract. It entails a full rated duration test to ensure compliance with the standard and should be recorded in a log book with a periodic inspection and test certificate issued.

Other Emergency Lighting

Following the installation of RCDs under Electrical Safety, to address the risk +identified of tenants needing to go into a dark cellar, often down uneven steps, to reset an RCD, the Unipol Code requires that an emergency light should be installed next to any consumer unit located in a cellar of an HMO.

As emergency lighting is not designed to be used to assist in the route of escape, the testing regime is as follows:

Annually

- a) A simulation of a failure of supply to ensure all luminaries (lamps & signage) are luminated whilst in emergency mode by Unipol Staff on inspection. The period of simulation should be sufficient for the purpose of this clause, whilst minimising damage.
- b) Check that all luminaries and all lamps are clean, undamaged and the lamps are not blackened.

Once every 3 years

A full rated duration test, in accordance with the manufacturer's guidelines by a competent service engineer.

A comprehensive list of emergency lighting is maintained by the Housing Management and Procurement Officer. "

Disabled Refuge Systems

Under current Building Regulations, all new non-domestic buildings with more than one storey provide "refuge" areas. A refuge area is a relatively safe place where a person/people who cannot easily use fire escapes and evacuation lifts can call for assistance and wait until help arrives.

In the event of a fire or emergency, disabled people are evacuated to the Refuge Area, where a remote unit can be activated.

Unipol has two buildings, Mill Street and Grayson Heights, that are equipped with a Refuge System and this incorporates an Emergency Voice Communication system (EVC).

The Refuge System comprises a panel on each landing (outstation) which feeds into an addressable master panel in the office. The lift landings are fire separated from the flats around them, meaning refuge could be taken either within a flat or on the landing. Pressing a button on the outstation sounds an alarm in the office and allows voice communication to a central point on the ground floor lobby.

The system is wired using fireproof cable and has battery backup in accordance with BS5839, Part 9. Should batteries fail, the system will give an "unhealthy" warning on the master panel.

Systems are tested for operation as part of the fire detection checks.

Weekly

Function test (of outstations on rotation) is undertaken by Unipol staff.

Monthly

Full system check is carried out by competent person (under a maintenance contract).

Soft Furnishings

All soft furnishings provided by Unipol within its portfolio meet the requirements of the *Furniture and Furnishings (Fire) (Safety) Regulations 1988* (as amended in 1989 & 1993). This legislation covers items such as mattresses, sofas, cushions and seat pads.

Unipol is not liable for any items that are non compliant if they are brought into the property by a tenant or tenants. Where a non compliant item is suspected (identified as part of a normal property inspection) Unipol sends a letter notifying the tenant of any potential danger and makes a strong recommendation that the item should be removed from the dwelling.

Tenant Education

Tenants receive information regarding fire safety in their building in the following ways:

- in their arrival information
- in the case of family tenants fire safety matters are raised in an individual house meeting held at the property
- in the relevant Tenant Handbook (either paper based or electronic)
- in a briefing given to all students who attend Unipol's socialising "welcome meal" at the commencement of the year
- from a "Safe and Secure" notice placed on the notice board in all student bedrooms in larger developments

- from a "Fire Instructions" notice placed on the notice board in all student bedrooms in larger developments in larger developments from a "Fire Instructions" notice placed next to any fire control panel in off street properties which contains instructions for operating the panel (present in all properties from April 2011). This allows tenants to interpret the information being provided and to react appropriately following a simple checklist.

The "Fire Instructions" notice gives clear instructions on what to do if the fire alarm sounds, how to report any fault and how to react if a fire is discovered.

The presence of all relevant notices, as detailed above, are checked as part of the housing management inspection process.

Security

Every Unipol property is fitted to ensure that suitable security provision is provided for the occupants. It is very important to keep dwellings secure against unauthorised entry thus avoiding fear of a burglary and the stress and anguish that burglary and possible injury can cause.

The level of the security provided varies depending on individual locations and circumstances of each property but the following standards are provided throughout the portfolio:

Burglar Alarms

All properties (including flats in complexes) where any doors or windows are accessible to the public on the ground floor are provided with a digital burglar alarm. The alarms are installed and tested to BS EN503131/1. Alarm systems are designed to ensure all potential entry points to the property are covered by PIRs or door contacts. None of the burglar alarms are key operated but work off a four digit number which can be changed if necessary. Numbers are periodically changed from time to time in any event.

Each alarm system is inspected as part of the housing management inspection procedure and tenants are also urged to report any malfunctions. All alarms have battery back-ups which permit activation if the power supply is cut off and these batteries are replaced from time to time, as necessary.

Each alarm system is thoroughly tested every three years by a competent alarm engineer. All alarms are fitted with a 20 minute cut off device.

Test details are logged in a Health and Safety Database to ensure that all relevant properties comply with these requirements.

Protection of Accessible Ground Floor Windows

Where the windows to bedroom rooms are located on the ground floor or lower ground floor, plain net curtains to a minimum density of 1.5 x width of window are fitted or the windows are covered with a reflective film. This is to stop passers-by seeing into the room and also deters the potential threat of speculative theft.

Where the threat of theft appears to be particularly high, warning stickers are placed on opening windows to encourage tenants to close all windows when not occupying the room.

In some circumstances accessible windows are fitted with metal window grilles. Where the windows form part of the fire escape strategy for the building, the grilles are fitted internally with a quick release mechanism.

External Doors

The type of security fitted to external doors varies across the portfolio because of varying factors of security, fire safety, location, mail delivery and occupancy type. As such it is not possible to categorise sections of the portfolio as up to a certain standard. However, a number of minimum standards and general considerations are taken into account as listed below:

Door Construction

External doors to all properties are of solid core construction. Where there are glazed sections to the doors, the glazing is either Georgian wired or laminated for increased security. The door frames are strong and well secured to the jambs. If an external door is replaced the full door set will be replaced in line with the BS: PAS24-1 "doors of enhanced security".

Door Entry Systems

Flat complexes where there are more than two flats served by a central entrance and staircase are fitted with door entry systems. These feature a call button to a handset in each flat and a remote door release mechanism. This avoids the problem of the front doors being propped open to allow access to visitors.

All door entry systems operate either a servo operated mechanical latch or electro-magnetically locking door. Where servo operated mechanical latches are used they are of a high security specification.

Residents gain access either with a key, a proximity reader which identifies a key fob kept with the residents key or a digital number punch. Tenants receive information about avoiding "tailgating" into buildings by unknown persons.

Letter Plates

Where letter plates are fitted in external doors these comply with BS2911/1974 (1980) and are located a minimum of 400mm away from any locks. All letter boxes fitted to HMOs are fitted with restriction devices to prevent access to the locking system internally via the letter aperture.

Where several letter plates are fitted in external doors they comply with BS2911/1974 (1980) and the mail is collected in individual key lockable compartments for each dwelling so that mail can not be stolen by other residents from within the building.

Wherever possible, mail is delivered directly to each flat and passed through a letter box in the front door.

Locks

Locking provision requires a balance between providing adequate security but maintaining ease of escape in the event of a fire. In line with the LGR Guidance, where the property is an HMO all external doors are fitted with a mortise lock with an internal thumb turn allowing escape from the building without the use of a key.

In off street HMOs Unipol uses five lever mortise locks conforming to BS:3621 or a euro profile mortise lock with cylinder as a minimum on its external doors where those doors form the principle barrier to access to the building.

In larger buildings Unipol uses cylinder operated lock cases which feature a self latching mechanism with an additional mortise throw bolt. This provides the self locking facility of a rim 'Yale' type lock with the additional security of a standard mortise lock, all operated via one key and internally releasable by

a thumb turn.

All door sets conforming to BS: PAS24-1 are designed with an acceptable level of lock security. If a door set of this type requires replacement locks conforming to BS EN 1303 Security Grade 3 (minimum) are used.

In many non HMOs mortise locks with a boxed keep to BS3621:1998 are used. These require a key to unlock both internally and externally. Unipol's preference (even in low risk buildings) as lock systems are replaced, is to move to locking mechanisms in non HMOs which allows escape from the building without the use of a key.

Additional Door Security

Doors are sometimes fitted with either tower bolts or thumb turn bolts. Family properties are always fitted with such bolts and door chains to the front door.

In some locations, particularly where properties have unobserved back entrances or where there is a history of break-ins, additional security is added to the door in the form of hinge bolts, anti-jimmy bars to door edge ("London bars") and frame edge or in extreme cases, metal sheeting to door faces.

Full high security door sets (fully compatible with Secured by Design standards) have also been installed in a number of high risk properties. These feature high security cylinder locks, triple point locking systems, high density laminate door materials with a metal door frame screw fixed directly into adjacent masonry.

Internal Lighting

All stairwell and communal areas shared by several separate dwellings are well lit to deter intruders.

External Lighting

Where lighting from adjacent street lighting provides insufficient external illumination, properties within the portfolio are fitted with 'dusk 'til dawn' lighting to enhance security.

To the rear of properties, where a security risk is identified, additional lighting is fitted to deter intruders.

In developments, major thoroughfares are well lit via high power lamps to provide a secure environment for tenants. Where any potentially vulnerable dark areas around the perimeter of sites exist, specific lighting is introduced to reduce the risk of intruders.

Although Unipol inspects all external lighting regularly to address any faults or lamp replacements, it relies upon tenants to report lamps that are malfunctioning. In larger developments, each light fitted carries a small label, at eye level, encouraging such reporting, giving a phone number and a reference number by which the relevant light can be identified.

Use of CCTV

In general, CCTV is not fitted to off street properties. Mobile CCTV equipment is used where any specific, and normally temporary, problems surface.

In larger new developments, CCTV is normally fitted.

CCTV systems are currently fitted at:
Alexander Court (from February 2011)
Cardigan Road Flats
Carlton Hill
Garden House (Managed Property)
Grayson Heights
Mill Street
New York Street
Royal Park Flats
Shay Street/Holborn Terrace

Where CCTV is fitted the systems are checked weekly by Housing Management Officers to ensure that cameras are operating properly. Technical staff check all systems monthly to ensure that all technical systems, including recording devices, are functioning correctly.

In order to increase awareness of CCTV coverage and to encourage faults to be reported as soon as possible flat screens are being introduced in key communal areas showing the signals from all CCTV camera, thus raising tenant awareness of this facility and encouraging the early identification of non working cameras. Screens will be in place in all of the above developments for tenant and housing management use from January 1st 2011.

All CCTV systems utilise Digital Video Recorders (DVR) which allow approximately one weeks footage to be retained and saved to CD Rom if required by Housing Management Staff or Police. Some systems have images broadcast to flats to allow tenants to oversee communal and car parking areas.

Garden Maintenance

Wherever possible, sight lines from the adjoining areas to the property are maintained to provide passive surveillance. Garden maintenance ensures hedges are kept trimmed low and trees are pruned so as not to obscure the properties.

Where low maintenance gardens are laid, the use of gravel or stone chippings as loose aggregate around the building perimeter provides a useful audible warning of any intruders on the property.

External Planning

On large sites, circulation and landscaping is designed in such a way that there are a minimal number of 'rat-runs' and many cul-de-sacs. This ensures that any intruders are easily identifiable. It also means that it is difficult for any intruder trying to leave the site to escape without using one of the few entrances.

In individual off street properties railings are frequently used to define public/private space for security. Unobserved rear yards are fully protected with locked 1800mm high railings where necessary while lower railings and gates, simply to delineate the space, are suitable to front

elevations where appropriate. Where external gates are fitted with a lock this is suited to the house main locking system ensuring that a single key fits all locks.

Tenant Information

All tenants receive a variety of information about security. This information incorporates sections about personal safety. Safe and Secure posters are displayed in each bedroom in large complexes giving full details of the security provisions of each particular flat. In off street properties Safe and Secure notices are being introduced in all properties, to be displayed in the hallway or kitchen. This process will be complete by April 2011.

Personal Possessions Insurance

Unipol provides personal possessions insurance (via an external insurance company) to all HMO tenants. Tenants' possessions are covered under the terms and conditions set out within the policy which tenants receive when they agree to rent a property or room.

Out of Hours Security Centre

Unipol operates an out of office hours security centre, currently based at Mill Street. A private firm (currently Securitas) provides dedicated and trained on site staff who currently respond to telephone enquiries outside of Unipol office hours. The security centre is also linked to an emergency call centre who can raise contractors to attend to emergency repairs and respond to lock-outs.

Unipol also employs a number of student wardens and residential staff at Carlton Hill, Mill Street, Grayson Heights, Eden Mount and Argie Avenue, who are on call on a rota basis for security emergencies and who can be contacted, in some cases directly, or via the security centre.

Lifts

The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) contains the requirements for the safe provision and use of lifting equipment. Regulation 9 of LOLER requires that all lifts provided for use in work activities are thoroughly examined by a competent person at regular intervals. In the case of Unipol's lifts, all of whom carry people, the requirement is that the lifts are examined at least twice a year.

As the duty holder of the lifts Unipol is legally responsible for ensuring that the lift is safe to use and that it is thoroughly examined. These responsibilities include:

- maintaining the lift so that it is safe to use
- selecting and instructing the competent person;
- ensuring that the lift is examined at statutory intervals (every 6 or months) by a competent person;
- keeping the competent person informed of any changes in the lift operating conditions which may affect the risk assessment
- making relevant documentation available to the competent person, e.g. manufacturer's instructions and maintenance records
- acting promptly to remedy any defects;
- ensuring that all documentation complies with the Regulations
- record keeping.

Unipol has five lifts (two in Mill Street, two in Grayson Heights and one in the main office) and all of those are manufactured by Kone and are all on maintenance contracts with the manufacturer.

It is important that the thorough examination is sufficiently independent and impartial to allow an objective assessment of the lift to be made. It is therefore important that the same company who performs routine maintenance is *not* used to carry out the thorough examination because they would then be responsible for assessing their own work.

Unipol uses an external Company (accreditation by the United Kingdom Accreditation Service to the relevant standard BS EN 45004) to carry out the twice yearly examination. The examination is carried out in the presence of the Projects Officer, who ensures that such an examination takes place as well as overseeing the maintenance contracts for those lifts.

After each examination a report is produced which is delivered to the Projects Officer who takes action, as directed by the report, and records that action on a report response. It is a legal requirement that reports of thorough examination are kept available for consideration by health and safety inspectors for at least two years. Unipol keeps all of its reports to provide a history of each lift's operation in any event and the reports are kept by the Housing Manager.

It is a condition of Unipol's insurers that they receive a copy of the reports and this is undertaken by the Financial Controller.

Windows

When replacing windows and doors, Unipol complies with current thermal performance standards and ensure a certificate is obtained from FENSA or Local Authority Building Control. FENSA enables companies that install replacement windows and doors to self-certify compliance under these Building Regulations without the need for a separate assessment from Building Control.

In order to comply with this obligation, Unipol will only use FENSA registered window fitters where window replacement is undertaken. Where full property refurbishment takes place, applications are likely to be made with Building Control and as such FENSA certification is not essential.

The FENSA scheme does not cover the following and work should be notified to the local authority:

- New build dwellings
- New domestic extensions
- Any glazing work in commercial and industrial buildings
- Listed buildings or those in conservation areas
- Doors with less than 50% glazing
- Room conversions e.g. bathroom converted into bedroom, new loft conversions
- Communal areas for flats

For the sake of clarity these requirements are not applicable when repairing existing windows, for example. repairing handles, replacing broken or damaged glazing or fitting or adjusting hinges.

Legionnaires' Disease

Unipol has only two buildings with centralised water facilities (cold only): Grayson Heights and Mill Street. Unipol has a contracted maintenance service to undertake the necessary servicing and cleaning of the water system as stipulated in the Health and Safety Manuals provided for the building by the developers.

Wherever there are tanked water systems it is necessary to take steps to ensure that water is not left standing in parts of the system for any substantial period of time. Water is run on all hot and cold outlets in any flats which have been empty for a month or more which flushes any stale water through.

The Health and Safety Executive publish an Approved Code of Practice (ACOP) and guidance for *Legionnaires' Disease: The control of legionella bacteria in water systems*. The main part of the ACOP is a requirement to carry out a two-yearly risk assessment to identify and assess potential sources of exposure to Legionella. This covers all properties, whether large or small. Although the generally high throughput and relatively low volume of water held in smaller water systems reduces the likelihood of the bacteria reaching dangerous concentrations a risk assessment must be carried out. The risk assessments should be reviewed periodically to ensure that any changes to water systems and usage of buildings are taken into account.

Unipol last undertook a third party risk assessments of Mill Street and Grayson Heights in February 2010. All significant items noted in those reports for rectification have been actioned. These included: labelling of calorifiers, fitting thermometers to calorifiers and further staff training.

All other water systems in Unipol properties are domestic type systems with a very low risk. According to the HHSRS V2 the average risk in all domestic dwellings is 1 in 1,423,649 with a very low harm outcome. This compares to fire, for example, which has a risk of 1 in 4,760 with a much higher harm outcome.

Any Unipol property which has been empty for a month or more with a domestic water system has water run on all hot and cold outlets before re-occupation to flush any stale water through.

Unipol occasionally manages properties that are fitted with 'Jacuzzi' type baths and the owner either agrees that these must be cleaned quarterly by a competent company or the bath is replaced.

Smoking and the Health Act 2006

Since the 1st July 2007 it has been illegal to smoke or allow smoking in enclosed public areas of properties. The Health Act 2006 provides the framework for smoke-free legislation and also creates a number of criminal offences for those who choose to ignore or break the law. The Health Act 2006 imposes certain obligations on Unipol as a housing supplier. This policy is also designed to protect employees, tenants, customers and visitors from exposure to second hand smoke.

All public areas in *developments* are smoke free. Common stairwells and entry lobbies serving flats are public areas.

Where public areas are involved appropriate 'no smoking' signs are clearly displayed at the entrances to and within premises in required areas. Signs:

- are at least A5 size
- are durable and properly fixed by contractors
- display the international no-smoking symbol;
- contain, in characters that can be easily read by persons using the entrance, the words: " No smoking. It is against the law to smoke in these premises".

Tenants of dwellings *where rooms are let individually* and their guests are permitted to smoke only in bedrooms with the door closed. Smoking is not permitted in kitchens/living rooms, corridors or shared toilets/bath/shower rooms of those dwellings.

Certain flats are designated smoking flats to assist smokers and non-smokers to live apart.

From January 1st these arrangements will be reflected more clearly in Unipol's tenancy agreements.

Where tenants are *renting the entire dwelling* (including tenants who are renting on a joint tenancy and jointly renting the entire premises) then there are no "public areas" within their premises. The Health Act 2006 allows smoking in their shared living space, because it forms part of their dwelling. However, Unipol expects occupants to negotiate and agree arrangements for permitting and restricting smoking.

Enforcement

Can be difficult. People smoking tobacco products in prohibited areas are politely asked to desist. Tenants who refuse to desist from smoking in a public area after being asked politely are provided with a letter from Unipol advising them:

- that their failure to adhere to this policy is a criminal offence, and that, unless the tenant complies with the law, action may be taken against them
- draws the tenant's attention to the clause in their tenancy agreement referring to the need to comply with the requirement to have smokefree areas as defined in The Health Act 2006
- of the support offered from their student advice service for smoking cessation.

If the tenant continues to smoke in a banned area then the Housing Management Officer will refer the matter to Unipol's Tenancy Support Officer who will arrange a meeting with them and if the tenant continues to smoke in a banned area after this meeting then they are sent a standard solicitors' letter.

If no positive response is received to the solicitor's letter Unipol will move towards possession proceedings.

Visitors who refuse to desist from smoking are politely asked to leave buildings (with the assistance of security staff if necessary).

Outside the building Unipol has a number of areas that can be used by smokers. These areas are located where they will not cause others to walk through smoke or cause smoke to enter the building through windows. Wall mounted bins are provided for smokers and the areas are well-lit to reduce dangers at night to personal safety.

Play Areas

Unipol currently manages three play areas for children:

Argie Avenue
Cardigan Road
Woodsley Terrace

The safe installation and operation of these play areas is achieved in the following way:

Installation Risk Assessment

All play areas are designed and installed by Association of Play Industries (API) contractors. A designer's risk assessment is carried out and all equipment is covered by and installed to EN1176 & EN1177. The manufacturers play equipment is covered by a BSI Kite mark Licence.

Regular Inspections of Equipment

In order to ensure the ongoing safe use of the equipment a regular system of checking takes place.

This includes:

- an annual check by an API or NAPA approved contractor in accordance with EN1176 Part 1. Copies of the pass certificates kept on file at Unipol office
- a twice yearly (to coincide with general inspections) visual check of the equipment by Housing Management staff
- Copies of the inspection sheets are filed in the Unipol office and any action required to be ordered via the standard repairs procedure.

Gyms

Unipol has an on-site gym at Mill Street. The safe operation of the gym in Mill Street is achieved in the following way:

Tenant Induction

Tenants are required to learn how to use the gym by watching an Induction Video online at the following URL: http://www.unipol.leeds.ac.uk/Housing/MS_gyminduction.asp

This can be watched either individually or as part of a group but any person wishing to make use of the gym must confirm that they have viewed the film in its entirety by signing the relevant form to that effect. These forms are kept in a central file at Mill Street and tenant's key fobs are activated to enable access the Gym.

Staff Responsibilities

Staff are not insured to act as gym or fitness instructors or directly provide any training, advice or information on how to use the machines. Students with questions about the operation of equipment are referred back to the online Induction Video.

Staff check during each shift that the gym is clean, tidy and in good working order and this information is logged at the Mill Street. Any staff suspecting damage should report this to the Senior Housing Management Officer immediately who will contact Precor under the terms of the Maintenance Agreement.

Staff Who are Tenants

Staff who are tenants at Mill Street must watch the Induction Video and abide by this at all times. When working, staff should only enter the gym to carry out visual checks of the area and should not advise users of the equipment.

When using the equipment socially (which is allowed), staff should ensure their opinions are not construed as guidance or advice from Unipol."

Property Inspections

Unipol carries out full property inspections at least twice a year in HMOs and once a year in other properties (although this will be more often if problems are found). The inspection routine checks the property for:

- disrepair
- the quality of previous work undertaken in the property
- management issues relating to tenant behaviour
- matters relating to the health & safety regime for that type of property.
- the permitted level of occupancy within the property.

tenants are given advance notice of the inspection and invited to be present and inspections are not intrusive but are thorough. They form an important part of being a Unipol tenant. A list of what will be checked and what standard will be expected is included within the letter of notification.

For students not living in HMOs (normally older students with dependants or couples) the term inspection is not used and is replaced by the term "review".

A record of the inspection or review is kept and a feedback form passed to the tenants. Any observations noted during the inspection are then acted upon.

In larger developments the communal corridors, stairwells and external areas are checked weekly by Housing Management Officers to ensure

- the sterility of these areas free from litter and unauthorised storage
- that lighting and fire detection systems function properly
- that waste is being properly disposed of, the bins emptied regularly and to maintain clean bin areas
- the standard of garden maintenance
- the correct security arrangements are in place
- all external locking systems and gates are working properly
- cars parked on site are authorised to be present and are road taxed

Housing Act 2004 - Risk Based Assessment and Licensing

As previously mentioned Part I of the Housing Act 2004 introduced with the Housing Health and Safety Ratings System (HHSRS) which consists of a risk-based assessment and an inspection of a property by a qualified person, normally an environmental health officer.

The officer rates 29 areas of risk and scores them. If the score is above a certain numerical point then a Category 1 hazard exists and this needs rectifying and the Local Authority can take enforcement action if this action is not taken.

The HHSRS applies to all houses, except Local Authority and RSL stock. This includes owner occupied houses and all private rented housing (whether an HMO, or licensed or not).

The link between the HHSRS and licensing (Part II of the Act) is that if an HMO requires licensing then it is more likely to be inspected under the HHSRS although indications are that few formal HHSRS inspections are taking place within the Leeds area by the Local Authority in respect of compliant licensed properties where no other problems have been reported.

Although the Housing Act came into force on 6th April 2006, Unipol, using the prototype of the HHSRS commenced the risk assessment of all of its properties as early as 1999 and since that time has had all properties in the portfolio assessed by an independent assessor. In December 2005 previous risk assessments were converted to HHSRS Version 2 scores (as implemented by Part I of the Housing Act 2004).

Unipol reinspects all properties under the HHSRS every five years using a qualified Senior Environmental Health Officer with a particular expertise in this area. Any new properties entering the portfolio are assessed within the six months of them doing so. This includes properties managed on behalf of other owners.

A report is issued and filed on a database and action is taken on any matters raised and records maintained on action taken.

Housing Act 2004 Part II

Part II of the Act defines an HMO and also defines what properties need licensing. In brief, in student housing, any house that is shared by 3 or more unrelated students is likely to be an HMO.

If a house is an HMO and is on three or more floors (each floor being habitable) and is shared by five or more persons then it is licensable. The licence lasts for 5 years (unless a shorter time is granted by the Local Authority) after which a new license is needed.

Licensed HMOs need to meet a set of regulatory standards laid down by statute as interpreted by the relevant Local Authority, in Unipol's case, Leeds City Council. Each license states what standards need to be met and Unipol ensures that those standards are met, if necessary, by a deadline contained in the license. It is also a requirement that training is received about HMOs, standards and management and Unipol fully complies with this requirement.

All properties in Unipol's portfolio that need licensing have a license. In the case of managed properties entering Unipol's portfolio, any existing license is transferred into Unipol's name or Unipol applies, on behalf of the owner, for a license. Unipol also ensures that if any changes are made to the property affecting the license then that license is amended.

A central file of licenses are kept in Unipol's offices and a copy of the relevant licence is displayed by the entrance door of each specific property. Licenses are held in the name of the Financial Controller. Leeds City Council also maintains a public record of properties licensed under the Act.

Housing Students with Physical Disability

In its methodology HHSRS does not take into account any additional risk or vulnerability.

Where Unipol is housing a student with a disability, where the chances of hazards is increased, their institution is asked to provide a personal risk assessment for the student which can be acted upon in making any individual adjustments to the arrangements within the dwelling.

Unipol's Tenancy Support Officer assists in this process and provided additional support, if required, to the student concerned.

Insurance Cover

Unipol properties are covered by the following policies:

- Employers Liability Insurance
- Public Liability Insurance
- Directors and Officers Liability Insurance
- Buildings and Contents cover

In addition the following complexes are covered for alternative accommodation in the event that they cannot be used:

Alexander Court
Argie Avenue Phases 1 and 2
Cardigan Road Flats
Carlton Hill
Grayson Heights
Mill Street
New York Street
Royal Park Flats
Shay Street/Holborn Terrace
Westfield Court
Woodsley Terrace/Mount Preston Street

and any other properties where the Financial Controller determines the financial risk to require insurance.

Insurance cover is also obtained to cover loss of rental income if a dwelling was unoccupiable to ensue that replacement housing could be provided and paid for.

APPENDIX A – Schedule of Back to Back Properties

Following an HHSRS survey the following properties are occupied only by single households because they would pose an unacceptably high risk as an HMO.

18 Autumn Street
19 Autumn Place
19 Kelsall Avenue
20 Kelsall Place
15 Highbury Place

The following properties, currently under the Unipol Property Management Scheme, are larger shared back to back properties with a final exit route through the kitchen. An independent HHRSS assessment has not note them as of particular higher risk.

39 Harold View
15 Harold Mount
12 Beechwood Mount
15 Haddon Place

APPENDIX B - Health and Safety Responsibilities of Key Staff

Overview

Unipol has two main Health and Safety Policies, *the Health and Safety Policy for Housing* and *the Health and Safety Policy for Offices and Staff*. These are at the centre of the organisation's health and safety regime and detail the commitments and operational requirements in this area across the whole organisation.

The Assistant Chief Executive - Housing Services has overall responsibility for *the Health and Safety Policy for Housing*, and is assisted by the Housing Manager who has a central role in co-ordinating and verifying that all systems are being properly followed and recorded.

The Housing Manager also chairs the Health and Safety Review Board that ensures that all policies are monitored and reviewed annually. The membership of that Review Board is, The Housing Manager (Chair), the Assistant Chief Executive - Housing Services, The Deputy Chief Executive, the Development Manager, the Housing Manager, the Projects Coordinator and the Housing Management and Procurement Officer. The Assistant Chief Executive - Housing Services has a key role within that Review Board and will annually review:

- all operational aspects of *the Health and Safety Policy for Housing*
- raise any difficulties encountered in that operation
- suggest any improvements or changes that need to be made.

The Development Manager has overall responsibility for the Health and Safety Policy for Offices and Staff, and the Projects Coordinator has a parallel role to that of the Housing Manager in ensuring that the policy is being correctly implemented and verified.

Chief Executive

The Chief Executive of Unipol has overall responsibility for the running and development of the whole organisation, which includes certain legal responsibilities under both Company and Charity law. The Chief Executive is responsible to the Board for the entire day to day management of the Charity and is responsible for maintaining accountability to the trustees in policy and development matters.

Deputy Chief Executive

The Deputy Chief Executive is the key post in the organisation focussing on the oversight, co-ordination, running and ongoing development of Unipol's service outputs in all areas of operation excepting finance. The Deputy Chief Executive reports directly to the Chief Executive and is responsible for establishing a number of quality control and output measures to ensure that, especially a times of pressure of work, that essential routines and administrative procedures are maintained and remain robust.

The Assistant Chief Executive - Housing Services

Is directly responsible to the Deputy Chief Executive for managing and letting Unipol's housing portfolio. They have overall responsibility for the Health and Safety Policy for Housing and is a member of the Health and Safety Review Board and has a key role within that Review Board. In this regard they:

- design, maintain and monitor inspection routines that provide information about future action to be taken in respect of both tenants and the portfolio
- ensure that the Housing Manager undertakes safety monitoring systems and operates these correctly and maintains verification documentation
- identify any health and safety issues or problems and following up and rectifying any identified deficiencies
- ensure housing management cover, including emergency cover, is maintained for the portfolio on a 24 hour seven day a week basis
- ensure that when properties are taken into management that all proper health and safety documentation is properly available and filed
- oversee and negotiate maintenance and service contracts
- operate the repairs reporting system
- ensure that Unipol fully complies with the law in respect of its portfolio under the Housing Act 2004 and is the responsible person in respect of licensing under Part 2 of the Housing Act 2004
- maintain a set of routines to ensure that the standards within the Unipol Code and the National Code for Larger Student Developments are met

They also have first line responsibilities in respect of the risk assessment for the portfolio ensuring that:

- the housing portfolio is independently risk assessed (under an HHSRS process) not less than every five years
- if the RRO applies they will ensure a full risk up to date assessment relating to fire is kept on file and in the case of off-street properties, that a member of the housing management team complete an individual risk assessment (based on a framework document within the LGR Guidance) at the point that lettings commence and that a copy of that, for each relevant address, is kept on file.

The Assistant Chief Executive - Housing Services has important training responsibilities in respect of health and safety matters in the ongoing area of housing management and housing management skills.

The Housing Manager

The Housing Manager is answerable to, and supports, the Assistant Chief Executive - Housing Services and sits at the hub of Unipol's housing management system to co-ordinate, supervise, guide and monitor the housing management team. They also take first line responsibility for the delivery of a number of operational systems in the *Health and Safety Policy for Housing* including the delivery of important health and safety routines relating to the Unipol property portfolio.

The Housing Manager chairs Unipol's Health and Safety Review Board and convenes meetings, decides agendas and reports back to the Chief Executive on conclusions reached.

The Housing Manager ensures that staff have an up-to-date operational knowledge of Unipol's *Health and Safety Policy for Housing* and also ensure that the policies are both applied and followed within

the housing management team and that verifiable records are properly kept and properly filed as part of those procedures. Particular attention is paid to the following systems:

- properties are NICEIC inspected and certificated
- gas appliances are serviced annually
- fire extinguishers, fire alarms and emergency lighting are serviced as required
- intruder alarms are serviced
- fire alarm tests and emergency lighting tests are undertaken as required, including maintaining a testing log
- portable appliance testing is undertaken necessary
- instruction manuals are provided to tenants with a particular emphasis on the health and safety aspects of any instructions
- maintain a comprehensive routine of HHSRS inspections
- maintains records in respect of planned and preventative maintenance servicing
- maintaining records in respect of examination of lift reports (and a response to those reports)
- ensure that M & E servicing contracts are set up for larger developments
- ensure that the Projects Co-ordinator is fulfilling their operational responsibilities for controlling any identified risk from Legionella as the nominated "responsible person" for the organisation

The Housing Manager also ensures that the health and safety responsibilities of the *Senior Housing Management Officer (Procurement and Co-ordination)* are being followed makes regular, systematic and verifiable checks to ensure that this is the case.

Senior Housing Management Officer (Procurement and Co-ordination)

The Housing Management and Procurement Officer has important health and safety matters to administer, overseen by the Housing Manager and assists them to ensure that all of Unipol's:

- properties are NICEIC inspected and certificated
- gas appliances are serviced annually to Gas Safe standards
- fire extinguishers, fire alarms and emergency lighting are serviced as required
- intruder alarms are serviced
- fire alarm tests and emergency lighting tests are undertaken as required
- portable appliances tests are being undertake as directed

and that up to date verifiable records are maintained in an easily accessible and well ordered manner for all these matters.

Projects Coordinator

The Projects Coordinator is an important member of the Development Manager's specialist team of professionals and has a number of first line responsibilities for specific areas of health and safety under the Health and Safety policy for Housing:

- maintaining a comprehensive routine of HHSRS inspections, as detailed in the policy, keeping HHSRS reports up to date and working with the Housing Manager to ensure that an action plan is formed, and acted upon within a given timescale to address serious hazards identified

- ensuring that Unipol fulfils its legal obligations in respect of planned and preventative maintenance servicing, negotiating with contractors and ensuring that M & E servicing contracts are set up for larger developments
- taking first line and operational responsibility for controlling any identified risk from Legionella as the nominated "responsible person" for the organisation and ensuring compliance with the Health and Safety Executive Approved Code of Practice and Guidance (ACOP)
- overseeing the safe operation of Unipol's lifts and compliance with the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) ensuring that a maintenance contract is in place to ensure the safe provision of lifting equipment and ensuring that all lifts provided are thoroughly examined by a competent person not less than twice a year and that reports, and a report response, is passed to the Housing Manager for retention.
- ensuring that all verification documentation is given to the Housing Manager who holds the central role for record keeping.

Appendix C: Planned Preventative Maintenance (PPM)

Unipol has two large buildings under maintenance contracts, Mill Street & Grayson Heights where the following checks are made by them and confirming documentation are checked by Unipol staff:

Mill Street & Grayson Heights

- Pressurisation Vessel - bi annual
- Cold water booster Unit - bi annual
- Cold Water storage tank - Annual
- TVC sampling - annual
- Water temperature monitoring - monthly
- Seldom used outlets - monthly
- Shower heads - annual
- Air curtain - quarterly (Mill Street only)
- Air handling Unit - bi-annual (Mill Street only)
- Mansafe system - annual (Mill Street only)
- Supply grills - annual (Mill Street only)
- Fans in landlord area- annual
- Generator - bi-annual & annual
- Dry risers - annual
- Roller shutter - annual
- RCD protection - bi annual
- Lighting protection - annual
- Smoke ventilation system - bi-annual
- Legionella Sampling - see section on Legionnaires Disease page 29
- Emergency lighting - see section on Emergency Lighting Page 19
- Disabled Refuge Systems - see section on Disabled Refuge Systems