

Health and Safety

Policy for Housing

unipol

the home of student housing

**Approved by the Unipol Board
November 2018**

Contents

Introduction.....	3
The Legislative Environment.....	4
The Housing Health and Safety Ratings System	4
Licensing Under Part II of the Housing Act 2004	4
Local Government Regulation (formerly LACORS) Housing - Fire Safety Guidance on fire safety provisions for certain types of existing housing.....	5
Framework for the Health and Safety Policy.....	6
Gas Safety.....	7
Electrical Safety	9
Fire Safety	13
Risk Assessment	13
Fire Safety and Precautions	14
Fire Detection Systems	16
Mixed Use Developments.....	18
Testing Regimes.....	19
Emergency Lighting.....	20
Soft Furnishings.....	22
Tenant Education	22
Security	23
Lifts.....	27
Legionnaires' Disease.....	29
Asbestos	29
Energy Performance Certification.....	30
Smoking and the Health Act 2006	323
Play Areas.....	345
Property Inspections	368
Housing Act 2004 - Risk Based Assessment and Licensing	378
Construction (Design and Management) Regulations 2015.....	40
Housing Students with Physical Disability	401
Insurance Cover.....	412
Emergency, Disaster and Incident Plan.....	43
APPENDIX A - Schedule of Back to Back properties.....	44
APPENDIX B - Health and Safety Responsibilities of Key Staff.....	45
APPENDIX C: Planned Preventative Maintenance (PPM)	52
APPENDIX D - Fire system overview.....	55

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 just under 3000 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 720 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. With effect from 1 October 2018 mandatory licensing of HMOs will be extended so that smaller properties used as HMOs in England which house 5 people or more in 2 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 3+ occupants
- a house or flat occupied by persons forming a single household and including 2 unrelated people sharing.

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

For the purposes of fire safety and risk assessment, the common parts of a property let on individual lets become any area within the property, apart from the bedroom. The risk is seen to be higher in a shared property let to occupants who may not know each other. In a property let to a group on a joint tenancy, there are no 'common' areas.

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 has a database 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 installation 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 rented to a group on a joint 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
- on common parts of sub-divided buildings (usually buildings divided in to flats)
- 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 the safety of people in the premises if a fire does start.

Assessments for dispersed properties 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.

Assessments for the large developments take the methodology of the PAS 79 (The Publicly Available Specification published by BSI) which gives a nine-step structured approach and corresponding documentation for carrying out and documenting significant findings of fire risk assessments in buildings.

All risk assessments are reviewed annually by Unipol's Health and Safety Review Board which is chaired by a member of the Board 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 the Housing Manager

Fire Fighting Equipment

All properties are provided with a fire blanket complying with the current British Standard BS EN3:. 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 they are fitted to the current British Standards BSEN3. 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 Team Leader 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.

Back-to-back houses

Where the only exit route is through a high risk area (normally the kitchen) Unipol only offers tenancies to lower risk single households (couples or a family) to remove the risk associated with shared student occupants. Unipol does manage properties for owners that on occasions are larger

shared properties. See APPENDIX A Schedule of Back to Back properties for full details. Leeds City Council's *Fire Safety Principles for Residential Accommodation* has a specific set of recommendations for Back to-Back houses (both singly and Multiple 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.

Compartmentalisation and route of escape

Within HMOs in Unipol's own portfolio, each habitable room is given a 30 minute protection. Within managed HMO properties this is a requirement by 2015. This protection 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 D generally apply. Some example systems are described below but exact systems may differ from property to property.

Unipol exceeds regulatory requirements by fitting:

Single Households - including properties for families, couples and 2 non related tenants sharing

- FD30s to the kitchen (with an effective overhead hydraulic self-closer and with intumescent strips and cold smoke seals)
- LD3 Grade D AFD system (smoke detection and sounders on every level of circulation space including stairwells, corridors and lobbies that form part of the escape route)
- an interlinked heat detector in the kitchen
- interlinked smoke detection (if existing) and heat detection (if a new system) in any Cellar

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

- FD30s to the kitchen (with an effective overhead hydraulic self-closer and with intumescent strips and cold smoke seals)
- a 30 minute protected route of escape with FD30 (with intumescent strips) to all rooms opening onto the route of escape including bedrooms (bedroom self-closers not required)
- LD3 plus Grade D AFD system (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*
- an interlinked heat detector in the kitchen
- interlinked smoke detection (if existing) and heat detection (if a new system) in any cellar

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

- FD30s to the kitchen (with an effective overhead hydraulic self-closer and with intumescent strips and cold smoke seals)
- a 30 minute protected route of escape with FD30 (with an effective overhead hydraulic self-closer and with intumescent strips and cold smoke seals) to all risk rooms opening onto the route of escape and living room
- 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
- an interlinked heat detector in the kitchen
- interlinked smoke detection (if existing) and heat detection (if a new system) in any cellar

High Risk HMOs - Five to Six storeys

- FD30s to the kitchen (with an effective overhead hydraulic self-closer and with intumescent strips and cold smoke seals)
- a 30 minute protected route of escape with FD30S (with effective overhead hydraulic self-closers and with intumescent strips and cold smoke seals)
- an LD2 Grade A AFD system
- an interlinked heat detector in the kitchen
- interlinked smoke detection (if existing) and heat detection (if a new system) in any cellar
- Emergency lighting

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

BS5839 LD2 Grade A alarm systems 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.

In 47 Cliff Road, which is a larger shared 16 bed property deemed to be higher risk, so a manual test of the panel and 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.

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 3 buildings, Mill Street and Grayson Heights and Norwich Union House, Nottingham (managed property), 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 or in each communal area in family and shared HMO's.
- 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 cannot be stolen by other residents from within the building.

Wherever possible, mail is delivered directly to each flat and posed 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
Argie Avenue phase I & II
Belle Vue House
Cardigan Road Flats
Carlton Hill
Garden House (Managed Property)
Grayson Heights
Doris Birdsall
Dyers Court
Mill Street
New York Street
Norwich Union house, Nottingham
Royal Park Flats
Shay Street/Holborn Terrace
St Martin's Terrace
Tannery Square
Woodsley 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 are in place in all of the above developments for tenant and housing management use.

All CCTV systems utilise Digital Video Recorders (DVR) which allow approximately one week's 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

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 4 Site) 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, Royal Park Road, Garden House, The Blenheims, Doris Birdsall and Norwich Union House in Nottingham , 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 6 lifts (two in Mill Street, two in Grayson Heights, 1 at Norwich Union House, Nottingham 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 five buildings with centralised water facilities (cold only): Grayson Heights, Mill Street, 47 Cliff Road, Norwich Union House, ID apartments.. 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 properties (tanked or untanked) that 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 undertakes a third party risk assessments at;

- Mill Street - next due October 2020
- Grayson Heights – next due October 2020
- 47 Cliff Road – next due December 2020
- Norwich Union House - next due November 2019
- ID Apartments – next due June 2019

All significant items noted in those reports for rectification have been actioned.

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.

Asbestos Policy

The Control of Asbestos Regulations 2006 states that asbestos must be properly managed, and that as a body responsible for maintenance and repair of buildings, Unipol has a duty to manage any asbestos that is, or may be, present in Unipol properties.

Under the Regulations, all non-domestic buildings are included, whatever the type of business; as well as the common areas of residential rented buildings (eg hallways, staircases, lift shafts, roof spaces). This means that any Unipol property with common areas (eg sub-divided buildings with a shared entrance and staircase) will require an asbestos record to be kept, regardless of the need or intention to carry out any maintenance works.

The Unipol properties with common areas are:

Dispersed properties

48 Archery Road
Belle Vue House
2b Consort Terrace
6 Rear Blandford Gardens
12 Rear Blandford Gardens
16 Rear Blandford Gardens
6 Marlborough Gardens
7 Marlborough Gardens
11 Marlborough Gardens
7 Marlborough Grove 41 Cardigan Road
12 Clarendon Place
14 Clarendon Place
41b Clarendon Road
14 Hamilton Avenue
46 Hamilton Avenue
38 Hanover Square
44 Hanover Square
23a Hanover Square
95 Victoria Road
9 Victoria Terrace
15 Victoria Terrace
25 Victoria Terrace
27 Victoria Terrace
1 St Martins Terrace
80 Victoria Road

Large Developments with common areas

Alexander Court
Argie Avenue I & II
Cardigan Road flats
Doris Birdsall Halls
Garden House
Grayson Heights flats
New York Street
Mill Street - N/A
Norwich Union House
Royal Park Road flats
Shay/Holborn Terrace
Tannery Square
=Woodsley Terrace/MPSDyers Court

Managed properties with common areas

175b Belle View Road- Hepple

The Asbestos Record for each property will contain the following information:

- Location of any asbestos-containing material (ACM) and its condition

Or:

- Confirmation that the building is free from ACM

The Asbestos Record will be completed by a specialist contractor, will be held centrally as a computer-based record, and will be accessible by staff with responsibility for health and safety, and will be made available to staff with responsibility for maintenance and project work, including Approved Contractors working on behalf of Unipol.

The Dutyholder (person with responsibility for the asbestos policy), is the Assistant Chief Executive - Housing Services, who is supported by the Housing Manager, who also has responsibilities in respect of the Unipol Health and Safety Policy for Housing.

The Asbestos Record for each property will be reviewed annually in November, and a visual check of any ACM will be made on an annual basis by the Housing Management Officer responsible for each property. Any deterioration, damage or disturbance of the ACM should be reported to the Housing Manager, who will employ the services of a specialist contractor to repair, encapsulate or remove the affected ACM.

Where it is known that ACM is present, the Asbestos Record should be made available to any contractors who may be working in the property.

Housing Management staff will receive, as part of their induction programme, basic training on the identification of ACM, how to access and read an Asbestos Record, and when it is necessary to provide the relevant information to Approved Contractors.

When large scale refurbishment works are planned on any Unipol property, where it could be possible for ACM to be present (i.e. where a property was built before 1999, before the ban on asbestos use was brought into force), and an asbestos survey has not been done within the past 5 years, a full Asbestos Demolition Survey will be procured, by the Development Manager, as part of the works programme. These surveys will be held in the central computer-based record for future reference.

Energy Performance Certification

Unipol ensures it meets its obligations in respect of making Energy Performance Certification available to tenants and those seeking to rent Unipol's housing (including managed properties) and will ensure that such certification is easily available on the web and is properly filed in the office

It ensures that certification is valid and commissions new inspections at the end of the 10 year validity period where appropriate

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
Tannery Square

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. With effect from 1 October 2018 mandatory licensing of HMOs will be extended so that smaller properties used as HMOs in England which house 5 people or more in 2 or more separate households

Construction (Design and Management) Regulations 2015

Unipol (as a "Client" under the regulations) has certain responsibilities when undertaking all construction jobs. Unipol ensures that suitable management arrangements are in place for construction projects.

For small projects of low complexity, contractors are appointed who are on Unipol's list of Approved Contractors, which requires them to have demonstrated that they have sufficient competence and resources to undertake the work. Unipol provides suitable pre-construction information to contractors by specifying its requirements for the construction project, details of the site and any existing structures or hazards.

Where projects are notifiable (those lasting more than 30 days, or involving more than 500 person days of construction work) Unipol appoints a competent CDM Co-Coordinator. The CDM Co-Coordinator co-ordinates the health and safety aspects of design work. This includes:

- ensuring that the Health and Safety Executive are informed of any notifiable projects
- that works do not commence unless a construction phase plan is in place
- facilitating adequate communication between the client, designers and contractors on all matters relating to health and safety.

The CDM Co-Coordinator also ensures there are adequate welfare facilities on site and compiles a health and safety file for each project.

The Housing Manager keeps a record of all CDM Co-Coordination appointed in respect of each project.

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 ensure that replacement housing could be provided and paid for.

Emergency, Disaster and Incident plan

An Emergency is classed as serious and imminent danger to the health of residents and/or staff, a risk to safety or serious damage to buildings. This Plan works to minimise disruption and prevent worsening of the situation.

This Plan is designed to:

- provide guidance and direction in the event of an emergency situation;
- safeguard property;
- facilitate the early restoration of a building service;
- protect the operation and reputation of the company; and
- provide guidance on when to implement a major incident emergency response

This Plan includes a system of escalation from on-site staff or Housing Management Officer involvement, to a full crisis management team depending on the circumstances of the incident. Unipol is available 24 hours a day - outside of normal office hours, an external security company respond to tenant enquiries and they are trained to deal with emergencies and the procedures to take.

In *all* cases, the staff attending the emergency will communicate with, and be directed by, the emergency services in attendance until those emergency services relinquish control of the situation.

Although the Plan concentrates on responding to reasonably foreseeable incidents, they are flexible enough to form the basis of a response to any unpredicted scenario'

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 noted them as of particular higher risk.

39 Harold View
15 Harold Mount

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 strategic responsibility for both policies and for periodically reviewing them to ensure that they are working well operationally and are fit for purpose. They are assisted by, and oversee, the Housing Manager, who has the central role in the operation of both policies, co-ordinating and verifying that all systems are being properly followed and recorded and who, in turn, supervises others who have direct responsibilities for fulfilling designated tasks under the *Health and Safety Policy for Housing*.

The Health and Safety Review Board, currently chaired by the Deputy Chief Executive ensures that both policies (and all risk assessments made) are kept under review and formally reviewed annually following input from the Assistant Chief Executive - Housing Services. Any significant policy changes are required to be reported to Unipol's Board and approved by them.

The current membership of that Review Board is a representative of the Board (Chair), The Deputy Chief Executive, the Housing Manager – Compliance & Logistics, the Assistant Chief Executive - Housing, the Development Manager, 2 Team Leaders, and the Senior Housing Management Officer, Nottingham

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.

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 on-going 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

Health and Safety

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 has overall strategic responsibility for both policies and for periodically reviewing them to ensure that they are working well operationally and are fit for purpose. They are assisted by, and oversee, the Housing Manager - Logistics and Compliance has the central role in the operation of policies, co-ordinating and verifying that all systems are being properly followed and recorded and who, in turn, supervises others who have direct responsibilities for fulfilling designated tasks under the *Health and Safety Policy for Housing*.

The Health and Safety Review Board, chaired by a trustee ensures that both policies (and all risk assessments made) are kept under review and formally reviewed annually following input from the Assistant Chief Executive - Housing. Any significant policy changes are required to be reported to Unipol's Board and approved by them. The Assistant Chief Executive - Housing 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.
- write an annual report to the Board detailing changes and recommendations made.

Detailed Responsibilities

The Assistant Chief Executive - Housing has:

- overall responsibility for the following key areas of Unipol's housing operations:
 - ensuring that safety monitoring systems and maintaining verification documentation take place as required by the relevant policy
 - ensuring housing management cover, including emergency cover, is maintained for the portfolio on a 24 hour seven day a week basis and that this system is capable of dealing with the institutions, parents, students and relevant external agencies following any serious incident
 - ensuring, on taking properties into management, that all proper health and safety documentation is properly available and filed
 - maintaining a set of routines to ensure that the standards within the Unipol Code and the National Code for Larger Student Developments are met and maintain a complete set of up to date documentation relating to larger developments as required as part of that Code's verification processes.

The Assistant Chief Executive - Housing also:

- ensures that the housing portfolio is risk assessed (under an HHSRS process) not less than every five years and that any relevant outcomes are acted upon within a defined timescale, depending on the severity of the risk identified
- draws to the attention of the Development Manager any changes or improvements required to ensure that all of the portfolio meets the required standards of the Local Authority under Housing Licensing and the Housing Health and Safety Ratings System (eradicating all Category 1 hazards identified)
- ensures that if the RRO applies, as it does to all large buildings and to smaller houses let under single tenancy (and for all HMOs in houses by April 2018) then, in the case of larger buildings, they will ensure a full risk 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 relevant LACORS Guidance) at the point that lettings commence and that a copy of that, for each relevant address, is kept on file. All RRO related risk assessments are reviewed annually
- assisted by the Housing Manager - Logistics and Compliance and the Housing Manager - Operations, ensures that Unipol fully complies with the law in respect of its portfolio under the Housing Act 2004, and in particular that all properties that should be licensed have a license that is current and where the conditions of any licence that have been issued are met within the timescales outlined on each licence.

- be the nominated "responsible person" for the organisation in respect of Legionella compliance with the Health and Safety Executive Approved Code of Practice and Guidance (ACOP).

Information and Communication

The Assistant Chief Executive - Housing will ensure that (assisted by the Housing Management Team):

- up to date information is available on Unipol's web sites about Unipol's portfolio and housing operation and health and safety policies in respect of its housing portfolio
- is a member of the Health and Safety Review Board and writes a report to the Board following each meeting.

The Housing Manager – Compliance & Logistics

The Housing Manager - Compliance and Logistics is the central point for ensuring (including enforcement) that all operational aspects of *the Health and Safety Policy for Housing* are being followed and verifiable records are properly kept and properly filed as part of those procedures. This includes:

- ensuring that the core documentation within the ANUK/Unipol Code of Standards verification files are maintained in an ordered and up-to-date manner
- working closely with the Assistant Chief Executive - Housing in respect of any issues relating to safety or safety procedures within Unipol's own property portfolio, keeping them suitably informed of any problems or developments
- working with the Development Manager to ensure that designated housing management staff are inducted, trained and kept up to date in simple risk assessment procedures relating to the Housing Health and Safety Rating Scheme (HHSRS) and know how to undertake risk assessments and ensuring that assessments are undertaken in line with the event policy and records maintained.
- working with both the Development Manager and the Senior Housing Management Officer, where hazards have been identified under the HHSRS to address and minimise those risks
- undertaking risk assessments under the Fire Safety Regulatory Reform Order 2005, where applicable
- ensuring that Unipol fully complies with the law in respect of its portfolio under the Housing Act 2004, and in particular that all properties that should be licensed have a license that is current and where the conditions of any licence that have been issued are met within the timescales outlined on each licence. The Housing Manager - Operations has a role in supporting the licencing processes and the associated administration.
- maintaining an up to date working knowledge of the LGA (formerly LACORS) national guidance on fire safety and ensuring that Unipol follows that guidance, as interpreted by the relevant Fire and Rescue Services and Leeds and Nottingham City Councils.

The Housing Manager - Compliance and Logistics will ensure that the following responsibilities are being fulfilled by the *Housing Team Leaders* and will make regular, systematic and verifiable checks to ensure that this is the case, dealing with any shortcomings operationally and reporting, on in-depth issues to the Assistant Chief Executive - Housing for further action (*the term Unipol's properties also refers to managed and leased properties*):

- properties are NICEIC inspected and certificated, in line with Unipol's policies and that certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff and tenants (on request)
- gas appliances are serviced annually to GasSafe standards and ensure that all tenants are given copies of Gas Safety Certificates on moving into a property and upon the renewal of the certificate and that certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff
- fire extinguishers, fire alarms and emergency lighting are serviced annually and that a file of relevant certificates is maintained providing proof of this which is well ordered and readily accessible to all staff
- intruder alarms are serviced in line with Unipol's policy
- reports or concerns or issues relating specifically to staff safety or property safety are made to them and raised for any further action required
- fire alarm tests and emergency lighting tests are undertaken, as outlined in the policy and that each test is recorded appropriately in a log and that where a member of staff is absent then cover is provided by another Housing Management Officer so that the tests are carried out. The Housing Manager - Compliance and Logistics will co-ordinate and check the fire alarm testing logs as often as necessary to ensure that testing by Housing Management Officers is in accordance with the health and safety policy and rectifying any shortcomings
- undertake any portable appliance testing necessary and maintain a verifiable record of tests made
- ensure that all instruction manuals provided to tenants within dwellings are accurate and that instructions contain information about how appliances function and should be used, giving particular attention to the health and safety aspects of those instructions
- maintain a comprehensive routine of HHSRS inspections as detailed in the policy (undertaken by external consultants), keeping HHSRS reports up to date and working with the Housing Manager - Compliance and Logistics to ensure that an action plan is formed, and acted upon within a given timescale to address serious hazards identified and ensuring that all verification documentation is carefully stored in a central well-ordered location.
- managing three play areas for children at Argie Avenue, Cardigan Road and Woodsley Terrace. A Team Leader has first line responsibility for ensuring the on-going safe use of this equipment by maintaining a regular system of checking including an annual check by an API or NAPA approved contractor in accordance with EN1176 Part 1 with copies of pass certificates being properly filed and stored. If any remedial action is required, following discussion with the Assistant Chief Executive - Housing the Development Manager is responsible for commissioning and overseeing that work.
- ensuring that first line and operational responsibilities for controlling any identified risk from Legionella and ensuring compliance with the Health and Safety Executive Approved Code of Practice and Guidance (ACOP) with regard to the control of Legionella bacteria in water systems is being undertaken and ensuring that the obligations of the Code are fully understood and explained to the housing management team by the Team Leader who has first line responsibilities for PPM.
- ensuring that Unipol meets its obligations in respect of making Energy Performance Certification available to tenants and those seeking to rent Unipol's housing (including managed properties) and will ensure that such certification is easily available on the web and is properly filed in the office

The Housing Manager - Compliance and Logistics will ensure that EPC certification is valid and commission new inspections at the end of the 10 year validity period, as required by legislation. The Housing Manager - Compliance and Logistics will:

- assist the Housing Manager - Operations in the preparation of the Management Agreement and sign off the Agreement, with the Housing Manager - Compliance and Logistics or the Housing Manager - Operations being the first signator).
- take responsibility for signing any documentation in respect of new Management Agreements or Pre-Agreements
- arrange the handover of a new property from the owner to Unipol, ensuring that adequate keys and health and safety documentation are provided in a timely manner
- inform the Finance Manager about a new property entering management or a property that is leaving management so that payments can be made correctly
- correctly file all Agreements reached in relevant owner files accessible to other staff.
- is a member of the Health and Safety Review Board

Housing Team Leader

Housing Team Leader will maintain an operational knowledge of Unipol's Health and Safety Policies and will undertake a number of important health and safety matters and routines and will draw to the attention of the Assistant Chief Executive - Housing any operational difficulties or improvements identified from those routines.

They will assist the Housing Manager in respect of a number of important health and safety matters and routines. The Team Leader will, under the direction of the Housing Manager, ensure that all of Unipol's:

- properties are NICEIC inspected and certificated, in line with Unipol's policies and that certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff and tenants (on request)
- gas appliances are serviced annually to Gas Safe standards and will co-ordinate the Housing Management Team in order to ensure that all tenants are given copies of Gas Safety Certificates on moving into a property and upon the renewal of the certificate and that certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff
- fire extinguishers, fire alarms and emergency lighting are serviced annually and that a file of relevant certificates is maintained providing proof of this which is well ordered and readily accessible to all staff
- intruder alarms are serviced, as directed by the Housing Manager and that a file of relevant certificates is maintained providing proof of this which is well ordered and readily accessible to all staff.
- the Health and Safety database is kept up to date and maintained at all times.

Team Leader will liaise with the Housing Manager in respect of any concerns or issues relating specifically to staff safety or property safety.

has several important health and safety matters to administer, and provides support and provides essential assistance to the other Housing Team Leader in the development and operation of all health and safety policies for Unipol's offices

The Housing Team Leader is a key member of the Health and Safety Review Board and who, under the *Health and Safety Policy for Offices and Staff* is responsible for:

- the day to day operation of the policy and will draw to the attention of the Housing Manager any operational difficulties that occurs in administering the policy
- the important task of disseminating information on matters raised in the health and safety policy to all staff within Unipol and for building a strong culture of health and safety awareness and compliance and undertaking in-house training (including induction and refresher training) so that staff are informed about and understand the policy, the obligations it places on them and what they must do as a result of the policy
- assisting the Deputy Chief Executive to maintain a record of staff training and ensuring that Unipol has an adequate number of staff trained in first aid procedures, fire procedures, fire testing and fire evacuation procedures and the servicing and training related to the evac chair and drawing any shortfall to the Housing Manager
- assisting in reviewing of health and safety risk assessments for all of Unipol's offices
- maintaining a working knowledge of relevant legislation

Health and Safety - Housing

Unipol has a detailed Health and Safety Policy for Housing and the Housing Team Leader is responsible for knowing its contents and ensuring that all properties managed by them are in accordance with those policies and, where problems or difficulties are identified, drawing this immediately to the attention of the Housing Manager.

The Housing Team Leader will carrying out a number of health and safety routines that carry a high level of personal responsibility to comply with Unipol's Health and Safety Policy for Housing and legislative and regulatory requirements including fire servicing and testing, emergency light testing and checking CCTV is working and is being used correctly to identify problems.

The Housing Team Leader will maintain an operational knowledge of Unipol's Health and Safety Policies and will undertake a number of important health and safety matters and routines and will draw to the attention of the Assistant Chief Executive - Housing any operational difficulties or improvements identified from those routines.

The Housing Team Leader will assist the Housing Manager in respect of a number of important health and safety matters and routines. The Housing Team Leader will (with the assistance of their Assistant to the Housing Team Leader) ensure that all of Unipol's:

- properties are NICEIC inspected and certificated, in line with Unipol's policies and that certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff and tenants (on request)
- gas appliances are serviced annually to Gas Safe standards and co-ordinates the Housing Management Team in order to ensure that all tenants are given copies of Gas Safety Certificates on moving into a property and upon the renewal of the certificate and that certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff
- fire extinguishers, fire alarms and emergency lighting are serviced annually and that a file of relevant certificates is maintained providing proof of this which is well ordered and readily accessible to all staff
- intruder alarms are serviced and that a file of relevant certificates is maintained providing proof of this which is well ordered and readily accessible to all staff
- all Health and Safety records are kept up to date and in an orderly fashion at all times.

The Housing Team Leader will liaise with the Housing Manager in respect of any concerns or issues relating specifically to staff safety or property safety.

The Housing Team Leader will ensure that other members of the housing management team undertake fire alarm tests and emergency lighting tests, as required, but not less than weekly in larger buildings (in excess of 15 occupants) and that each test is recorded appropriately in a log and that where a member of staff is absent then cover is provided by another member of the housing management staff so that the tests are carried out.

The Housing Team Leader will report to the Housing Manager any member of staff who does not undertake a test at the relevant time and will ensure that the central log of testing is available for the Housing Manager or the Deputy Chief Executive to check at any time.

The Housing Team Leader will ensure that all instruction manuals provided to tenants within dwellings are accurate and that instructions contain information about how appliances function and should be used, giving particular attention to the health and safety aspects of those instructions

•

Development Manager

Provides support and assistance for the Housing Manager in the development and operation of all health and safety policies for Unipol's Housing.

In undertaking any works the Development Manager ensures that Unipol meets the CDM Regulations and that Unipol receives all relevant Health and Safety information and operations manuals and these are readily accessible and filed for continuous use.

Health and Safety

The Development Manager is responsible for overseeing Unipol's health and safety requirements (as a client) for works that they commission and oversee and for operating the policies in any properties they directly manage.

Housing Team Leader - JP

Unipol has a detailed Health and Safety Policy for Housing and the Team Leader is responsible for knowing its contents and ensuring that all properties managed by them is in accordance with those policies and, where problems or difficulties are identified, drawing this immediately to the attention of the Housing Manager.

The Team Leader will carrying out a number of health and safety routines that carry a high level of personal responsibility to comply with Unipol's Health and Safety Policy for Housing and legislative and regulatory requirements

b) Undertaking Systematised Monitoring of Planned Preventative Maintenance Contracts and Certain Servicing Routines

Unipol has a number of planned preventative maintenance contracts that cover a number of mechanical and electrical systems within its portfolio and offices. These cover both operational systems and health and safety matters including: plumbing maintenance, testing of fire and smoke detection systems, testing of emergency lighting, the correct working of air handling and air conditioning units, the operation of lifts and the maintenance of complex plumbing systems.

The Housing Team Leader will prepare contracts for planned preventative maintenance for the Housing Manager and will have first line responsibility for flagging when contracts are coming to an

Health and Safety Policy for Housing (V16 November 2018)

end to allow sufficient time for renegotiation or tendering for new contracts to be in place in a timely manner.

The Housing Team Leader has first line responsibility for undertaking regular monitoring and quality assessment of all PPM contracts and for maintaining a record system that verifies these checks have been made.

The Housing Team Leader will, as directed:

- manage contract quality and performance
- prepare and maintain building and routines and planned maintenance programmes
- ensure all work procurement documentation and financial procedures used are in accordance with the Unipol's policies, procedures and financial regulations
- supervise the overall management of contractors ensuring Unipol's policies, procedures, financial regulations, quality and safety standards are upheld.

Health and Safety and Management of Play Areas - Unipol manages three play areas for children at Argie Avenue, Cardigan Road and Woodsley Terrace. The Housing Team Leader has first line responsibility for ensuring the ongoing safe use of this equipment by maintaining a regular system of checking including an annual check by an API or NAPA approved contractor in accordance with EN1176 Part 1 with copies of pass certificates returned in a timely manner to the Housing Manager.

If any remedial action is required, following discussion with the Housing Manager the Development Manager is responsible for commissioning and overseeing that work.

Governance

The Housing Team Leader is a member of Unipol's *Health and Safety Review Board* that meets not less than once a year in Leeds to ensure health and safety policies are being properly followed and that a culture of health and safety is pervasive within the organisation.

Senior Housing Management Officer, Nottingham

The Senior Housing Management Officer will work (as directed) to support the Housing Manager who has overarching first line health and safety obligations for the housing portfolio in certain respects and in support role will undertake a number of important health and safety routines and will draw to the attention of the Housing Manager any operational difficulties or improvements identified from those routines.

The Senior Housing Management Officer will ensure that all necessary gas, electrical and other safety certification is obtained and passed to relevant staff for filing and verification as an integral part of their duties.

The Housing Management Officer will co-ordinate the HHSRS inspections that form part of Unipol's due diligence on risk assessment that takes place when a property is coming into management and is reassessed every five years after that.

Health and Safety

Health and Safety Policy for Offices and Staff :

The Senior Housing Management Officer will provide support and assistance for the Housing Manager by maintaining a health and safety culture and awareness amongst staff and visitors who work in the Nottingham Office and taking some first line responsibilities for specific areas of health and safety under Unipol's health and safety policy for offices and staff

- undertake systematised monitoring of planned preventative maintenance contracts and certain servicing routines

The Senior Housing Management Officer will work closely with the Housing Manager and the Team Leader on matters relating to health and safety in the Offices and will also has first line responsibility for:

- undertaking a weekly check of all aspects of health and safety in Unipol's main offices in Nottingham and assist the Senior Housing Management Officer with quarterly check
- organising, implementing and recording an annual fire evacuation drill for 28 Shakespeare Street and recording any unplanned evacuations
- ensuring that a risk assessment of necessary activities, processes, and use of equipment has been carried out and is readily accessible and current
- ensuring a high standard of housekeeping within the building, including enforcing good practice in the storage of equipment and consumables and reporting any difficulties in this area to the Housing Manager
- ensuring that adequate and suitable protective clothing and equipment is available for use by staff and visitors
- operating Unipol's procedures if an accident to staff or visitors should occur including:
 - arranging for the prompt reporting of accidents, in accordance with Unipol's procedures
 - investigating accidents and in the case of any serious accidents to jointly investigate these with the Deputy Chief Executive
 - investigating and reporting on any "near miss" incidents
 - reporting all significant issues arising from accidents and incidents to the Deputy Chief Executive

In order to operate the *Health and Safety Policy for Offices and Staff* the Senior Housing Management Officer will assist the Team Leader who takes responsibility for, and fulfils, a number of specific duties including ensuring and checking that:

- the first aid boxes regularly and keeping supplies kept up to date and ahead of their "use by" dates
- the certification of electrical appliances (including portable appliance testing), ensuring that certification is up to date and verification records are kept readily accessible at all times
- all fire extinguishers are maintained and serviced in the offices
- all air conditioning units are serviced, as required by regulation and policy
- all energy performance certification is undertaken as required by legislation
- emergency lighting is working and regularly tested
- all water coolers are operational and properly serviced
- the kitchen, other food preparation areas, the fridge and service areas meet the highest standards of hygiene (and capable of being maintained by others)
- test the fire alarms required, completing fire testing logs with exactitude, ensuring fire alarms are serviced and maintaining records of that servicing, rectifying any problems experienced in fire testing and servicing.
- will have first line responsibility for undertaking any portable appliance testing necessary, will be trained in this area and will maintain a verifiable record of tests made. The Officer will also co-ordinate an annual visual check of all electrical appliances and shall ensure that a verifiable record of checks made is held centrally and that any remedial work needed is undertaken.

Helping to put in place and undertaking systematised monitoring of planned preventative maintenance contracts and certain servicing routines

The Senior Housing Management Officer will:

- assist with undertaking regular monitoring and quality assessment of any PPE contracts in the Office and maintaining a record system that verifies these checks have been made
- assist with the maintenance and regular testing of the burglar alarm systems
- liaise with the Housing Manager in respect of any concerns or issues relating specifically to staff safety.

The Senior Housing Management Officer) has responsibility for the day to day management and maintenance of the office which includes:

- being the point of contact for all repairs reported from staff
- undertaking repairs and routine maintenance
- proactively inspecting the building periodically to ensure no disrepair occurs
- maintaining the building in good decorative order
- maintaining the fabric of the building
- ensuring efficient use of energy throughout the building
- maintaining the heating systems throughout the building
- ensuring the security of the building and the full operating order of all security related systems in the building (alarms, gates, locks and lights)
- overseeing the cleaning contract and monitoring that standard of cleaning undertaken
- ensuring that the Unipol car parking facilities are kept in good repair, free of litter and are secure.

The building is in constant use throughout the year and will house a small training facility (for up to 16 delegates) which will be used by external delegates. In undertaking works every consideration must be given to keeping disruption in these areas (when in use) to a minimum and close co-operation with the Training and Events Officer about proposed works affecting these areas is essential.

Appendix C: Planned Preventative Maintenance (PPM)

Unipol has the following properties under maintenance contract, where the following checks are made by Facilities Management Company and confirming documentation are checked by Unipol staff:

Alexander Court

Fire alarm system smoke ventilation fans - annually in November
Car parking gate - annually in October
Two visits a year to clean and service the ventilation system

Cardigan Road, 41B

Two visits a year to clean and service the ventilation system

Cardigan Road, 262 - 280

Two visits a year to clean and service the ventilation system

Carlton Hill

Lighting Protection - annual

Clarendon Place, 14

Two visits a year to clean and service the ventilation system

Cliff Road, 47, Leeds

Water temperature monitoring - monthly.
Legionella Sampling - see section on Legionnaires Disease page 29
This is part of water hygiene monitoring programme.

Doris Birdsall

Lightning Protection Test and Inspection - annual
Two visits a year to clean and service the ventilation system

:

Norwich Union House

3hr Emergency Lighting Test and Inspection - annual
1hr Emergency Lighting Test and Inspection - annual
Lightning Protection Test and Inspection - annual
Service of 50Kw Gas Boilers - annual
Landlords Gas Safety Inspections - annual
Shower Head Cleaning - annual
Inspection of Unvented Hot Water Heaters - annual
Inspection and test of AOV units including cleaning around seals - annual
Test and inspection of Man-Safe System - annual
Flat 15 and bin store sprinkler Inspections and run test if possible - bi annual
Test and inspection of fire alarm systems - bi annual
Undertake Functional Emergency Lighting Test and Inspection - monthly
Water temperature monitoring - monthly
Bin store automatic door closer

Grayson Heights

Fans in landlord area- annual
Cold Water storage tank - annual
TVC sampling - annual
Dry risers - annual
Roller shutter - annual
Lighting protection - annual
Pressurisation Vessel - bi annual
Cold water booster Unit - bi annual
Generator - bi-annual
RCD protection - bi annual

Seldom used outlets - monthly
 Shower heads - quarterly: one visit per year by FMC, three visits per year by a Cleaning Services
 Water temperature monitoring - monthly
 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
 Two visits a year to service roof - mounted extraction units

Haddon Road, 32, Leeds

Two visits a year to clean and service the ventilation system

Mill Street

Mansafe system - annual
 Supply grills - annual
 Fans in landlord area- annual
 Cold Water storage tank - annual
 TVC sampling - annual
 Dry risers - annual
 Roller shutter - annual
 Lighting protection - annual
 Pressurisation Vessel - bi annual
 Cold water booster Unit - bi annual
 Air handling Unit - bi-annual
 Generator - bi-annual
 RCD protection - bi annual
 Seldom used outlets - monthly
 Shower heads - quarterly: one visit per year by FMC, three visits per year by a Cleaning Services
 Air curtain - quarterly
 Water temperature monitoring - monthly
 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
 Fire dampers
The following properties have sump pumps and will be serviced annually

Unipol owned properties;

- 2 Moorfield Street
- 47 Mayville Avenue
- 23 Norwood Road
- 64 Ash Road

Managed Owners properties;

- 183 Hyde Park Road

Appendix D - Fire Detection Systems

Fire Detection systems	
LD1	Mains interlinked detectors in all areas of property and the route of escape
LD2	Mains interlinked detections in route of escape and all rooms that open directly on to it. Cellar and if self contained flat, the lobby leading on to communal stairwell
LD3	Mains interlinked detectors along route of escape only and any cellar

LD3 plus	Mains interlinked detectors along route of escape and any cellar and heat detector in kitchen and smoke detection in lounge
Grade A	Control panel - appropriate for higher risk HMO's
Grade D	Detectors have integral sounder and battery stand by supply - normal domestic suitable for medium and lower risk HMO's
Mixed Grade	Flat protected by local FDS and not connected to main building.
Fire doors	
FD	Fire door frame and door set fitted together to create a seal with an intumescent strip (rubber swelling strip to hold the fire but does allow smoke to seep) and are fitted where an LD3 automatic fire detection system in place
FDs	As above with additional requirement for cold smoke seals (brush to hold the smoke) and are fitted where an LD2 automatic fire detection system in place to restrict the passage of smoke
Self closers	Self-closing devices must be fitted to all entrance doors to flats and bedsit rooms and all kitchens. Self-closers should be fitted to all fire door in properties 3 - 4 storey and 5 - 6 occupants and rooms opening in to route of escape including bedrooms