

Health and Safety

Policy for Housing

November 2023

unipol

the home of student housing

Introduction	3
The Legislative Environment	4
The Housing Health and Safety Rating System	4
Licensing Under Part II of the Housing Act 2004	4
Local Government Regulation (formerly LACORS)	5
The Building Safety Act 2022	5
Framework for the Health and Safety Policy	7
Gas Safety	8
Electrical Safety	9
Fire Safety	12
Risk Assessment	12
Fire Safety and Precautions	13
Fire Detection Systems	15
Mixed Use Developments	17
Testing Regimes	18
Emergency Lighting	18
Disabled Refuge systems	20
Soft Furnishings	20
Tenant Education	20
Security	22
Lifts	26
Windows	27
Legionnaires' Disease	28
Asbestos	29
Energy Performance Certification	30
Smoking and the Health Act 2006	31
Play Areas	33
Property Inspections	34
Housing Act 2004 - Risk Based Assessment and Licensing	35
Construction (Design and Management) Regulations 2015	37
Housing Students with Physical Disability	38
Insurance Cover	39
Emergency, Disaster and Incident Plan	40
APPENDIX A – Schedules	41
APPENDIX B – Health and Safety Responsibilities of Key Staff	46

Introduction

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

Unipol currently houses around 3600 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 956 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 606 students in 88 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, which include membership of its own Unipol Code and therefore part of the Leeds Rental Standard 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 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.

There is no legislative or regulatory requirement to undertake this assessment. Currently Unipol has no category 1 hazards and it is unlikely that any can occur. HHSES will continue to be used where a new property has been acquired or brought into management or where sufficient changes are made to a building to warrant a further assessment.

Internal staff training is enhanced and refreshed annually, so that any Category 1 hazard that may occur can be dealt with through the housing management system.

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 was extended so that smaller properties used as HMOs in England which house 5 people or more in 2 or more separate households need to be licensed. Licensing was also extended to purpose built accommodation where the building was converted from a previous use.

In addition to the mandatory and additional HMO licensing, in Leeds, Nottingham and Bradford (cities within which Unipol operate), selective licensing has been introduced. Through these selective licensing schemes, landlords with privately rented properties in defined areas will need to obtain a license in order to be able to rent out their property.

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 firesafety 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.

The Building Safety Act 2022

Unipol is responsible for a number of occupied, high-rise residential buildings that are subject to the regulations and are registered with the Health and Safety Executive.

Where Unipol has responsibility for the repair of the building, Unipol is the accountable person for the building and 'PAP' duties will also fall to Unipol. Unipol will also be the "responsible person" for the purposes of existing fire safety legislation.

For occupied buildings, the Building Safety Act determines the identity of the duty holders, the accountable person(s) ("AP") and the principal accountable person ("PAP"). Whilst it is possible for the duty holders to engage third parties to discharge these duties, it is not possible to contract out of responsibility for these duty holder roles.

During design and construction of new developments, building safety duties will fall to the client, principal contractor and principal designer roles. The client role can be allocated contractually, and the client appoints the other duty holders.

Following registration and once invited by the HSE, Unipol will create and submit a safety case report and apply for a building assessment certificate. This will be renewed periodically, according to a timescale set by the HSE (likely to be every five years).

In addition, Unipol will establish a number of other key documents and systems for the occupied building, including:

- Resident engagement strategy;
- Complaints procedure;
- Mandatory occurrence reporting system; and
- Safety management systems to manage building safety throughout the life of the building.

<https://www.hse.gov.uk/building-safety/index.htm>

Framework for the Health and Safety Policy

A risk based approach to health and safety is taken to 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.
- A building covered by the Building Safety Act.

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

Gas Safety

The annual testing and approving of all gas appliances and installations (cookers, gas heaters, gas fires, hot water and heating boilers and associated pipe work) is set out within a regulatory framework. All properties are tested annually for gas safety purposes in accordance with the Gas Safety (Installation and Use) Regulations 1998 (GSIUR) as amended.

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 centrally to ensure that all relevant properties comply with these requirements.

Gas safety is further increased by Unipol using 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)

Following guidance effected from 1st January 2008 all gas cookers have to be fitted with FSDs in flats or multiply occupied buildings. 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).

When kitchens are being re-fitted, gas cookers are being replaced by electric ovens and gas hobs are being phased out and replaced with electric hobs as part of a carbon reduction programme.

Carbon Monoxide Detection

Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022 required the provision of a carbon monoxide alarm in any rooms used as a living accommodation which contains a fixed combustion appliance (excluding gas cookers) by 1st October 2022. Faulty alarms are replaced as soon as reasonably practical when issues are identified.

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 British Standard.

The predominant regulations affecting electrical safety and standards are the current Institution for Electrical Engineers Wiring Regulations, the current British Standard, 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.

Testing complies with Electrical Safety Standards in the Private Rented sector (England) Regulations which came into force on 1 June 2020 which requires that landlords have property electrics checked at least every 5 years by a qualified and competent person. Tenants are provided with the most recent copy of the electrical report on the Unipol Tenant's Portal and the record is kept centrally.

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 the British Standard) 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.
- 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.
- 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 the British Standard is obtained and recorded.

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 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 18th Edition of the IEE Wiring Regulations) came into effect in January 2019. All new commercial, domestic and industrial wiring installations after that date must be designed, constructed, inspected, tested and certificated to meet the requirements of the current British Standard. In some cases, where certain alterations are made to an electrical installation, that installation may need upgrading to meet the 18th Edition standard.

RCD on power circuits 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.

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 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.

The provision recently of RCD protection throughout its portfolio reducing the chances of electrocution or fire from unsafe appliances with that risk stemming 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 tenants will be 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 LED and 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 Energy Label system which primarily shows energy efficiency.

Instruction for the safe use of all electrical appliances provided by Unipol are made available at www.unipolhousing.org.uk. In some cases, where necessary 'point of information' instructions are 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 local Fire and Rescue Service and City Council under a protocol which allocates responsibilities for fire safety between them.

Risk Assessment - The Regulatory Reform (Fire Safety) Order 2005

This regime of fire safety enforcement came into force on 1st October 2006 and affects employers and those who are responsible for non-domestic, industrial, commercial and residential premises.

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

The Regulatory Reform (Fire Safety) Order 2005 places duties on housing providers to risk-assess fire safety in their properties, to take adequate precautions to reduce that risk and to manage that risk which remains. The duties apply throughout a range of property types, but in HMOs, flats and maisonettes and sheltered accommodation in which personal care is not provided they apply only within the common areas (although housing providers need to consider the risk created within the private areas too).

For commons parts of a building shared by multiple addresses, 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 into 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 and sub-divided off-street 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 LACors Guidance.

Assessments for family 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.

Assessments for Large Developments are assessed by a competent person, as defined by the Fire Risk Assessment Competency Council and taking into account the additional requirements in the Building Safety Act 2022 every three years.

An internal review is done in year 2 and 3, as long as there have been no material changes to the property. The review checks whether the original assessment is still accurate, comments on the completion of action points, and checks how the tenants are occupying the property. Housing Management Officers are adequately skill to carry out a review on this basis.

Risk assessments for all buildings with common parts are reviewed annually by Unipol's Health and Safety Review Group which is chaired by a member of the Board and has a membership of Unipol staff with specific responsibilities in this area.

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.

Any changes to the Fire Plan are drawn to the attention of the local fire authority. Fire detection and fire-fighting equipment are provided in line with that recommended by the fire risk assessment.

All properties are provided with a fire blanket complying with the current British Standard. These are located in the kitchen of the property.

Where fire extinguishers are required they are fitted to the current British Standards. 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.

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.

Fire blankets are also inspected annually and a record is documented centrally. If the blanket has been damaged it is discarded, if not, it is refolded, a new tamper tag fitted and reused.

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 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- 1. Schedule of Back-to-Back properties.**

Leeds City Council's *Fire Safety Principles for Residential Accommodation* has a specific set of principles for Back to-Back houses (both singly and Multiple occupied) and these are followed. In line with this, the kitchen layouts ensure 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 and managed, each habitable room is given a 30 minute protection. 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 and the smoke sealing must meet the current British Standard.

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. These are checked more rigorously in line with the Home Office Guidance.

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 current British Standard. The type of detection system provided depends upon the type, occupant type and layout of the property. Some example systems are described below but exact systems may differ from property to property.

Unipol exceeds regulatory requirements by fitting:

Single Households – up to 4 storeys, 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)
- LD2 Grade D1 AFD system (smoke detection and sounders on every level of circulation space including stairwells, corridors and lobbies that form part of the escape route) and including the lounge. *Grade D1 is a system of mains powered and interlinked detection and an interlinked heat detector in the kitchen*
- Interlinked smoke detection (if existing) and heat detection (if a new system) in any unoccupied Cellar.

Medium Risk HMOs - Up to Two Storeys and 5 or more tenants or up to Four Storeys with 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 and cold smoke seals should not be fitted if no detection in bedrooms)
- LD2 Grade D1 AFD system (smoke detection and sounders on every level of circulation space including stairwells, corridors and lobbies that form part of the escape route) and including the lounge and an interlinked heat detector in the kitchen

- Interlinked smoke detection (if existing) and heat detection (if a new system) in any unoccupied Cellar.

High 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 FD30s (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
- LD1 Grade D1 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 living room and an interlinked heat detector in the kitchen
- Interlinked smoke detection (if existing) and heat detection (if a new system) in any unoccupied Cellar.

Highest 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)
- LD1 Grade A AFD system which means fitting smoke detection along the route of escape, in the cellar, in living room, kitchens and all bedrooms. *Grade A is a system of mains powered which are linked to a control panel*
- An interlinked heat detector in the kitchen
- Interlinked smoke detection (if existing) and heat detection (if a new system) in any unoccupied Cellar
- Emergency lighting along route of escape (if long and complex and no effective borrowed light).

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

Grade A LD2 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 sub-divided properties with key lockable bedroom doors

A Grade A LD2 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 does not take responsibility for the testing and maintenance of fire systems out of Unipol demise.

Unipol ensures that:

- Separate entrances are provided to the accommodation
- Appropriate measures are taken to ensure that there is both vertical and horizontal fireprotection to maintain the integrity of the means of escape in accordance with British Standard
- 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 British Standard Grade A: LD (2) with detection in all risk and common areas together with Emergency Lighting. In a number of 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

In larger buildings, a high priority is placed on the avoidance of false alarms;

- 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
- 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 British Standards by a contractor who is a specialist fire engineer. This involves testing every detector, battery back-ups and the general functioning of the system at least once a year. All certification and tests are recorded centrally on a dedicated Health and Safety system.

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).

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. Staff also inspect means of escape on these visits.

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.

41 Cardigan Road, is a larger subdivided building deemed to be a 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.

Stand Alone Properties with Dedicated Fire Detection Systems

These properties are serviced once a year by a specialist fire engineer.

47 Cliff Road (a larger shared 16 bed property) and Belle Vue House (a 17 bed sub-divided property) are deemed to be higher risk and also come under the National Code for Large Developments (over 15 bedspaces), so a manual test of the panel and call points is carried out weekly 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 self-descriptive 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 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 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 British Standard and following Local Government Regulation.

Large developments and complex HMO's

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

Daily

Indicators of central power supply visually inspected for correct operation. This routine 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.

For Large developments monthly and annual checks are carried out as part of a PPM contract.

See **Appendix A – 2. Schedule of PPM routines**

Dispersed houses with normal risk

Most average sized premises with normal risk: an annual discharge test in accordance with the requirements of British Standards. 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 a 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.

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 a number of larger developments 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 the relevant British Standard. Should the 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:

- From a "Fire Instructions" notice placed on the notice board in all student bedrooms 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). This allows tenants to interpret the information being provided and to react appropriately following a simple checklist
- 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 the kitchen meetings at the start of the year
- From a "Safe and Secure" notice displayed in larger developments or in each communal area in family and shared HMO's.

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 an entry door to the property is accessible to the public on the ground floor are provided with a digital burglar alarm. The alarms are installed to the current British Standard. 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. All alarms are fitted with a 20 minute cut off device.

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 current British Standard "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 current British Standards 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 current British Standards) 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 posted 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 British Standard 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 British Standard are designed with an acceptable level of lock security. If a door set of this type requires replacement locks conforming to British Standard Security Grade 3 (minimum) are used.

In many non HMOs mortise locks with a boxed keep to British Standards 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 allow 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.

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.

Unipol inspects all external lighting regularly to address any faults or lamp replacements.

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.

See **APPENDIX A – 3. Schedule of CCTV locations**

Where CCTV is fitted the systems are checked weekly by Housing Management Officers to ensure that cameras are operating properly.

In order to increase awareness of CCTV coverage and to encourage faults to be reported as soon as possible flat screens in key communal areas show 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 store at least one week's worth of footage, either held on a local device or on a cloud hosted service, which can be exported if required by Housing Management Staff or Police.

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

In individual off street properties railings are frequently used to define public/private space for security. Unobserved rear yards are protected with locked 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 communal area in large complexes and dispersed properties giving full details of the security provisions of each particular flat.

Personal Possession 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. A private firm 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 Residents Assistants 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.

See **APPENDIX A – 4. Schedule of Residents Assistant locations**

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.

See **APPENDIX A- 5. Lift locations and maintenance contracts**

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 British Standard to carry out the twice yearly examination. The examination is carried out in the presence of the Housing Management Officer, who ensures that such an examination takes place. It is the responsibility of the Housing Team Leader to ensure the lift contracts are in place.

After each examination a report is produced which is delivered to the Housing Team Leader 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 recorded centrally.

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

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 a number of buildings with centralised water facilities (cold only):

See **APPENDIX A.7** *List of all sites with Centralised Water Facilities*

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 through any stale water.

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 all buildings with tanked systems every two years. It undertakes a basic internal risk assessment of other large developments without tanked systems every two years.

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 through any stale water.

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.

See **APPENDIX A – 6. List of Unipol properties with common areas;**

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 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. At the present time Unipol is not aware that any of its properties contain asbestos.

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), an updated asbestos survey will be procured as part of the works programme. These surveys will be held centrally 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.

Unipol 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.

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

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 smoke free 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 has a number of sites with play areas for children:

See **APPENDIX A – 8. Play area sites**

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
- 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 HousingManagement staff
- Records of the inspection are kept centrally and any action required to be ordered via the standard repairs procedure.

Cardio Studios

Unipol has a number of on-site cardio studios. The safe operation of the cardio studios is achieved in the following way:

See **APPENDIX A – 9. Cardio studio sites**

Tenant Induction

Tenants are required to learn how to use the gym by watching an Induction Video online. 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 the building and tenant's key fobs are activated to enable access.

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. Any staff suspecting damage should report immediately.

Staff Who are Tenants

Staff 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 feedback sent 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 clean bin areas maintained
- 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

Part I of the Housing Act 2004 introduced with the Housing Health and Safety Ratings System (HHSRS) 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 by Local Authorities in respect of compliant licensed properties where no other problems have been reported.

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 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, Bradford City Council, Nottingham City Council and Rushcliffe County 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 is 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 Unipol Student Homes.

All local authorities maintain a public record of properties licensed under the Act.

From 1 October 2018 mandatory licensing of HMOs in England was extended from only applying to shared houses with 5 or more occupants over 3 or more storeys to include smaller properties used to house 5 people or more in 2 or more separate households.

In July 2019, Leeds City Council designated both Beeston and Harehills areas to be subject to selective licensing from 6th January 2020.

Nottingham City Council currently runs 3 licensing schemes:

- Mandatory HMO Licensing
- Additional HMO Licensing
- Selective HMO Licensing - came into force on the 1st August 2018, and covers properties in the following areas: Arboretum, Bestwood, Bulwell, Bulwell Forest, Basford, Berridge, Bridge, Clifton North, Clifton South, Dales, Dunkirk and Lenton, Leen Valley, Mapperley, Radford and Park, Sherwood, St Ann's, Wollaton East and Lenton Abbey.

Construction (Design and Management) Regulations 2015

Unipol (as a "CDM Dutyholder" 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 Principle Designer. The CDM Principle Designer 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 Principle Contractor (Designer) also ensures there are adequate welfare facilities on site and compiles a health and safety file for each project. Unipol appoint Principal Contractors (Designers) for projects involving more than one contractor. Principal Designers are responsible for carrying out risk assessments. Principal Contractors liaise between the Designer and the Duty Holder and coordinator works between contractors.

The Assistant Chief Executive - Developments keeps a record of all CDM Co-Coordinators 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 provides additional support, if required, to the student concerned.

The Tenancy Support Officer will carry out a PEEP (Personal Emergency Evacuation Plan) with any tenants who declare a disability to ensure the accommodation is suitable.

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:

- Addison Street
- Alexander Court
- Belle Vue House
- Blandford Gardens
- Blandford Grove
- Cardigan Road
- Carlton Hill
- Churchill Gardens
- Consort Terrace
- Cotton House
- Doris Birdsall
- Dyers Court
- Marlborough Gardens
- Marlborough Grove
- Mill Street
- New York Street
- Oak House
- Phase 1 Argie Avenue
- Phase 2 Argie Avenue
- Royal Park Road
- Shay Street Complex
- Tannery Square
- Woodsley Terrace

and any other properties where the Director of Finance 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 the resulting costs covered.

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 and to invite senior management as and when necessary.

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 - Schedules

1. 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

2. Schedule of 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
- Cardigan Road, 41B
- Cardigan Road, 262 – 280
- Carlton Hill
- Clarendon Place, 14
- Cliff Road, 47, Leeds
- Cotton House
- Doris Birdsall
- The Student Hideout
- Grayson Heights
- Haddon Road, 32, Leeds
- Mill Street
- New York Street
- Sandhills
- Oak House

Unipol owned properties;

- 2 Autumn Terrace
- 23 Norwood Road
- 64 Ash Road

3. Sites with CCTV systems:

- Alexander Court
- Argie Avenue phase I & II
- Belle Vue House
- Cardigan Road Flats
- Carlton Hill
- Cotton House
- Garden House (Managed Property)
- Grayson Heights
- Doris Birdsall
- Dyers Court

- Mill Street
- New York Street
- The Student Hideout,
- Royal Park Flats
- Shay Street/Holborn Terrace
- St Martin's Terrace
- Tannery Square
- Woodsley Terrace
- Sandhills
- Oak House

4. Sites with Residents Assistants staff

- Carlton Hill
- Cotton House
- Mill Street
- Grayson Heights
- Doris Birdsall
- Sandhills
- Blenheims
- Holborn/Shay Street
- Oak House
- Royal Park Flats

5. Lift locations and maintenance

Unipol has 21 lifts in the portfolio

- Carlton Hill X 7 lifts maintained by KONE
- Cotton House X 4 lifts maintained by KONE
- Mill Street x 2 lifts maintained by KONE
- Grayson Heights x 2 lifts maintained by KONE
- Sandhills, x 2 lifts maintained by KONE
- Oak House x 2 lifts maintained by KONE
- Woodhouse Lane Offices X 1 lifts maintained by KONE
- The Student Hideout X 1 lift is maintained by Thyssen Krupp

6. Unipol properties with common areas:

Asbestos and RRO fire risk assessments apply

Dispersed properties

- 48 Archery Road
- 5 Belle Vue House
- Consort Terrace
- 8 Cardigan Road
- 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
- Marlborough Gardens
- Marlborough Gardens
- 11 Marlborough Gardens
- 7 Marlborough Grove
- 6 Rear Blandford Gardens
- 12 Rear Blandford Gardens
- 16 Rear Blandford Gardens
- 95 Victoria Road

- 9 Victoria Terrace
- 15 Victoria Terrace
- 25 Victoria Terrace
- 27 Victoria Terrace
- 1 St Martins Terrace
- 80 Victoria Road

Large Developments

- Alexander Court
- Argie Avenue I & II
- Cardigan Road flats
- Carlton Hill
- Cotton House
- Doris Birdsall Halls
- Dyers Court
- Garden House Grayson Heights flats
- New York Street
- Mill Street - N/A
- Oak House
- Royal Park Road flats
- Sandhills
- Shay/Holborn Terrace
- Tannery Square
- The Student Hideout
- Woodsley Terrace/MPS

7. Sites with Centralised water systems

The following locations are risk assessed every 2 years

- Carlton Hill
- Cotton House
- Grayson Heights
- Mill Street
- 47 Cliff Road
- The Student Hideout
- Sandhills
- Oak House

8. Sites with play areas

- Argie Avenue
- Cardigan Road
- Woodsley Terrace
- Tannery Square

9. Sites with Cardio studios

- Carlton Hill
- Cotton House
- Oak House
- Mill Street
- Sandhills

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 Health and Safety Review Board, 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 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, and the four Housing Team Leaders.

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 focusing 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 at 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 who 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:

- Draws to the attention of the Development Manager Compliance & Logistics 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 Local Regulation 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 Team Leaders, 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 Housing Team Leaders 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 Housing Team Leaders, 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 – Compliance and Logistics has a role in supporting the licencing processes and the associated administration.
- Maintaining an up to date working knowledge of the Local Government Regulation (formerly LACORS) guidance on fire safety and ensuring that Unipol follows that guidance, as interpreted by the relevant Fire and Rescue Services and Leeds, Bradford 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
- 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 Leaders

The Housing Team Leaders 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 Assistant Chief Executive – Housing, and the Housing Manager – Compliance and Logistics any operational difficulties or improvements from those routines.

The Housing Team Leaders have several important health and safety matters to administer, and provide essential assistance in the development and operation of all health and safety policies for Unipol's offices.

The Housing Team Leaders will carry 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.

The Housing Team Leaders will report to the – Housing Manager - Compliance and Logistics, 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 Assistant Chief Executive - Housing or the Deputy Chief Executive to check at any time.

The Housing Team Leaders 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.

They will assist the Housing Manager – Compliance and Logistics in respect of a number of important health and safety matters and routines. The Team Leaders will, under the direction of the Housing Manager – Compliance and Logistics, to 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.
- The Team Leaders will liaise with the Housing Managers in respect of any concerns or issues relating specifically to staff safety or property safety.

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 Leaders will prepare contracts for planned preventative maintenance for the Housing Manager - Compliance and Logistics and will have first line responsibility for flagging when contracts are coming to an end to allow sufficient time for renegotiation or tendering for new contracts to be in placed in a timely manner.

The Housing Team Leaders have 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 Leaders 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 Leaders have 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 returned in a timely manner to the Housing Manager.

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

Undertaking a Number of Overarching Responsibilities, Supporting and Working with the Housing Manager – Compliance & Logistics

The operation, monitoring and training out of hours security staff (either provided in house or out-sourced) - The Housing Team Leaders have first line responsibility for ensuring that all security staff are properly inducted and trained and that the contractual obligations relating to their services are being maintained, together with the maintenance of out of hours emergency services and phone line operations are working properly.

In fulfilling these responsibilities a close working relationship with the Senior Housing Management Officer (Mill Street) is essential as is a close working relationship with the Assistant Chief Executive - Housing, who oversees security levels and undertakes the renewal and negotiation of contracts for the security staff.

The Administration of Important Health and Safety Matters

Health and Safety Policy - Offices and Staff

The Housing Team Leaders need to work together in fulfilling their responsibilities under the *Health and Safety Policy for Offices and Staff* including:

- The day to day operation of the policy in the offices for Leeds, Bradford and Nottingham
- Disseminating information on matters raised in the health and safety policy to all staff for building a strong culture of health and safety awareness and compliance 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 in reviewing of health and safety risk assessments for the Offices
- Maintaining a working knowledge of relevant legislation.

The Housing Team Leader will work closely with the Housing Manager – Compliance and Logistics on matters relating to health and safety in the Offices and also has first line responsibility for;

- Undertaking a weekly check of all aspects of health and safety in all Unipol offices and undertake a quarterly check
- Organising, implementing and recording an annual fire evacuation drill for Unipol offices, 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 Assistant Chief Executive – Housing.
- 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 Team Leaders have 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.

The Housing Team Leaders have 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.

Governance

The Housing Team Leaders are members of Unipol's Health and Safety Review Board that meets not less than once a year to ensure health and safety polices are being properly followed and that a culture of health and safety is pervasive within the organisation.

Assistant Chief Executive – Developments

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

In undertaking any works the Assistant Chief Executive – Developments, will ensure 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 Assistant Chief Executive – Developments 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 including maintaining the register for asbestos in respect of refurbishment and renewal work

The Assistant Chief Executive - Development maintains the organisation's list of Approved Unipol Contractors for their own, and other staffs' use (according to criteria laid down and reviewed from time to time by the Deputy Chief Executive).

The Assistant Chief Executive - Development also is responsible for maintaining contractor quality, performance and the timely delivery and completion of the works.

The Assistant Chief Executive - Development has first line responsibilities for:

- Ensuring that all of Unipol's grounds are properly maintained in a well-kept condition
- Preparing specifications and tenders for gardening and accepting those tenders
- Undertaking works with budget
- Undertaking additional investment needed to order to maintain garden and yard infrastructure
- Undertaking checks of external areas and reporting to the Chief Executive on the standard of maintenance being achieved
- Ensuring that all paths, yards and other areas within Unipol's boundaries are maintained free of weeds and without trip hazards.

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

