



Tenant and Resident Safety Strategy (Ref: PS 04)

Purpose of Policy: to monitor the Association's compliance on the management of Tenant and Resident Safety across its Assets, ensuring the safe provision of homes and common spaces.

Policy Monitoring Details	
Department	Property Services
Author	Amanda Hay
Status	Group
Date Board Approval	25 August 2021
Update	
Planned Review Date	January 2026
Regulatory Outcomes Being Achieved	<p>Regulatory Outcomes 3 Management of resources 4 Good quality information and advice</p> <p>Charter Outcomes 4 Quality of Housing – Meet SHQS when allocated 6 Estate Management – live in well maintained neighbourhoods where they feel safe</p>
Tenant Consultation Required	No
Equalities Impact Assessment	Initial/Full/Not Required
HRA Implications	Article 8 Right to Respect for Private Life, Family Life and the Home Article 14 Prohibition of Discrimination

Content List	
1.	Introduction
2.	Aims and Objectives
3.	Review / formulation of Tenant and Resident Safety Management Systems

4.	Development of Assurance Reporting
5.	Reporting to SHR
6.	Other Relevant Policies and Procedures
	<p>Appendix 1 Contracts for Compliance</p> <p>Appendix 2 Statistics Collated</p> <p>Appendix 3 Tenant Safety Audit (September 2020) Recommended Actions</p> <p>Appendix 4 Tenant and Resident Safety Related Policies revision dates</p> <p>Appendix 5 Action Plan</p>

1.	Introduction	
	1.1	This Strategy is written to monitor the Association's compliance with the management of Tenant and Resident Safety across its Assets, ensuring the safe provision of homes and common spaces by the Association.
	1.2	The Association will follow all legislation in relation to Tenant and Resident Safety from the stance as landlord, and in mixed tenure locations, as property factor.
	1.3	The Scottish Housing Regulator (SHR) outlines what we should do by legislation and good practice
	1.4	This Strategy will illustrate the system followed, define reporting cycles and give the Board assurance across all aspects of Tenant and Resident Safety.
2.	Aims and Objectives	
	2.1	<p>The aim of this strategy is to outline how the Association records and stores information, certificates and reports relating to the following areas of tenant and resident safety, and manages improvements or enhancements to the systems :</p> <p>Management of Asbestos</p>

		<p>Legionella and water treatment Gas servicing Electrical Safety including periodic electric checks and Portable Appliance Testing Estate Management Fire regulations – smoke detection and carbon monoxide detection Fire regulations – shared domestic buildings and common stairs Emergency Repairs Houses in Multiple Occupation</p>
	2.2	<p>The Association must comply with the legal duties as social housing provider and property factor stemming from the following legislation :</p> <p>2.2.1 Management of Asbestos</p> <ul style="list-style-type: none"> • Health & Safety at Work Act 1974 • Control of Asbestos Regulations 2012 • The Management of Health and Safety at Work Regulations 1992 • 1996 Special Waster Regulations • RIDDOR Report of Injuries, Diseases and Dangerous Occurrences Regulations 2013 • The Construction Design and Management Regulations 2015 <p>2.2.2 Legionella and water treatment</p> <ul style="list-style-type: none"> • Approved Code of Practice (ACOP) L8 – ‘Legionnaires Disease: The Control of Legionella Bacteria in Water Systems’ Approved Code of Practice. • Health & Safety at Work Act 1974 • The Management of Health and Safety at Work Regulations 1992 • The Control of Substances Hazardous to Health (COSHH) Regulations • The Workplace (Health, Safety and Welfare) Regulations • The Occupiers’ Liability Acts • The Water Supply (Water Fittings) Regulations 1999 S I 1999 No 1148. • The Water Supply (Water Fittings) (Amendments) Regulations 1999. S.I. 1506. • BS6700: 2006 Specification for Design Installation, Testing and Maintenance of Services Supplying Water for Domestic Use within Buildings and their Curtilages • BS7942: 2000 Thermostatic Mixing Valves for use in Care Establishments. • HELA Circular, Scalding risks for Hot Water in Health and Social Care, LAC Number 79/5.

2.2.3 Gas servicing

- Gas Safety (Installation & Use) Regulations GS1UR 1998 and Approved code of Practice 2018

2.2.4 Electrical Safety including periodic electric checks and Portable Appliance Testing

- Housing (Scotland) Act 2014
- Tolerable Standard (revised 2019)

2.2.5 Fire regulations – smoke and carbon monoxide detection

- Housing (Scotland) Act 1987 Tolerable Standard (revised 2019)

2.2.6 Fire regulations – shared domestic buildings and common stairs

- Fire (Scotland) Act 2005
- Fire Safety (Scotland) Regulations 2006

There is separate and specific legislation covering High-Rise buildings in Scotland. The Association does not have any buildings falling within this category at present and any new acquisitions would be fully assessed to clarify requirements.

- Health and Safety at Work Etc. Act 1974
- Occupier's Liability (Scotland) Act 1960

2.2.7 Toxic Gasses, Radon and Methane

- Radon Occupancy Factors 2018

2.2.8 Houses in Multiple Occupation

- Housing (Scotland) Act 2006 Part 5 Licensing of Houses in Multiple Occupation

The actions required by these legislative directions have been put forward to the **Appendix 5 Action Plan** and will be reviewed, developed and updated as detailed in section 4 Development of Assurance Reporting to ensure :

1. Demonstration of compliance with all relevant legislation and guidance
2. Robust data to offer a due diligence defence if required
3. Maintain reputation as a 'reasonable landlord'
4. Continued application of robust risk management and corporate governance.

		Progress with the actions listed in Appendix 5 Action Plan will be reported in line with 2.3 and 4.0.
	2.3	The Association will have in place the following reporting mechanisms to give Board assurance: Quarterly review SMT Actions tied into 90 day Strategic Planning Cycles and reported to Board with Strategic Plan Updates Annual Board update including review of Action plan.
3.	Review / formulation of Tenant and Resident Safety Management Systems	
	3.1	The Association holds significant amount of data across these areas of tenant and resident safety and runs a regimented programme of contracts to ensure we undertake our responsibilities in each cycle.
	3.2	In recent years further guidance has been published moving some areas from good practice to legislation and the Association's Management system had been developing and absorbing those requirements.
	3.3	With the SHR undertaking further scrutiny of Tenant Safety across all RSLs it is now logical to improve the data records and reporting to give board assurance that all areas of Tenant and Resident Safety are covered satisfactorily.
	3.4	The feedback from recent Internal Audit on Tenant Safety (September 2020) will be utilised and incorporated into the formulation of the Tenant and Resident Safety Management System.
	3.5	Staff competency and training requirements are assessed and monitored through Health and Safety Audits – conducted bi-annual in connection with CEO, and CSM as Health & Safety Coordinator for the Association. SMT will ensure all staff training records are maintained up to date for review and that staff present for training opportunities in their areas of job role including IT. All policies and procedures falling under Tenant and Resident Safety will include a Staff training section highlighting requirements and indicative frequencies.

4.	Development of Assurance Reporting	
	4.1	<p>Once the initial Tenant and Resident Safety Strategy is agreed the SMT will develop pie charts similar to the other quarterly KPIs with suggested Quarterly KPI reports to the Board :</p> <p>April August October January.</p>
	4.2	<p>It is proposed that Property Services Director will build the KPI reports, initially from areas mentioned, and add to the reports as the action plan progresses.</p>
	4.3	<p>The SMT will undertake a minuted review of Tenant and Resident Safety Strategy outcomes each quarter and consider any further investigation work required. The SMT recognise that the Appendix 5 Action Plan is a working document and further items may be added at each review.</p>
	4.4	<p>The Property Services and Housing Management teams will work together through the development areas and action plan, and present an annual report to Board on successful actions and adjustments required.</p>
5.	Reporting to SHR	
	5.1	<p>The Scottish Housing Regulator Annual Return (ARC) on Charter reports on two tenant and resident safety items :</p> <p>Percentage of Properties with Gas Safety Record renewed within 12 months</p> <p>Average hours to complete emergency repairs</p> <p>The reports are collated April to March and presented to the Board in May each year.</p>
	5.2	<p>Notifiable Events</p> <p>All current notifiable events are reported to Board at each meeting until formal closure of the event.</p>
6.	Other Relevant or Related Policies	
	<p>Asbestos Management Policy Estate Management Policy</p>	

	Gas Servicing No Access Legionella Strategy
--	--

Tenant and Resident Safety Strategy Appendix 1

CONTRACTS FOR COMPLIANCE

Safety Topic	Dept	Contract Held	Contract renewal	Safety Aspects Covered	Further development required
Asbestos Management	Property Services	Socotec – call off for survey	Future		Properties without survey Follow up or re-inspection Asset database Sharing of records with Contractor
Legionella & Water Management	Property Services	Cocoon – water treatment	Q1 2021		Re-tender works for competitive price
Gas Servicing	Property Services	Lothian Gas	Future	Service date compliance and no access system	
Electrical Check	Property Services	Various	Future	Some on 3 year re-check Portable Appliance Testing	All records to be filed and retrievable by property address No access system in line with gas servicing Contract terms reviewed and all records to be filed and retrievable by property address
Fire Regulations – smoke and carbon monoxide detection	Property Services	Various	Contracts completing in 2021	No access followed up	Annual checking and servicing, specific arrangements for no heat and electric heated properties
Fire Regulations – residential buildings containing separate	Property Services	FRAs FCS Live	Call off available	Security and safety of common stair and protocol for MEHA / Factor responsibility	Roll out to mixed tenure stairs

dwelling / households					
Emergency Repairs	Property Services	Novus Lothian Gas	Future Future	Includes all emergencies 24 /7 including Right to Repair	Right to repair update
Estate Management	Housing Management and Property Services	Greenfingers & tree / garden contractors Cleaning contractors AJG insurer CEC	Future	Trip hazards, uneven surfaces and dumped goods	Regular targeted programme of site inspections

Tenant and Resident Safety Strategy Appendix 2

STATISTICS Collated

Safety Topic	Dept	Statistics to Review	Statistics Present	ARC report	Further development required
Asbestos Management	Property Services	Number properties with full survey Number and age of properties without survey	To be collated	No	Collate statistical representation
Legionella & Water Management	Property Services	Number of tanks requiring dosing Percentage of tanks treated within 12 months	Yes	No	
Gas Servicing	Property Services	Number of properties with gas Percentage of properties serviced within 12 months Incident involving HSE or serious threat to tenant Serious accidental injury or death of tenant Regulator Authority notified concerns Statutory Authority notified concerns	Yes Yes Yes Yes Yes	Yes Yes	
Electrical Check	Property Services	Percentage of properties with certified check within 5 years	Yes	Yes – SHQS from 2022	Method to force access for inspection
Fire Regulations – smoke detection	Property Services	Number of properties with LD2 smoke detection fitted Number of properties without LD2 smoke detection fitted Number of properties with gas	Yes Yes Yes	Yes – SHQS from 2022	Covid delays to current contracts to be re-programmed

And carbon monoxide detection		appliance and carbon monoxide detection fitted Number of properties with gas appliance without carbon monoxide detection fitted	Yes		
Fire Regulations – residential buildings containing separate dwellings	Property Services & Housing Management			No	To be developed
Emergency Repairs	Property Services	Reactive Maintenance and Gas Maintenance Emergency Repairs – Number of call outs Average time to complete Cases outwith target	Yes Yes Yes	Yes Yes	

Tenant and Resident Safety Strategy Appendix 3

Tenant Safety Audit (September 2020) Recommended Actions

No.	Finding	Priority	Recommendation	Management Comment	Planned Implementation date	Revised Target Completion
1	There is no policy governing communal areas which are to be subject to Fire Risk Assessments.	3	The Association implement a policy for Fire inspection/action of communal areas.	The Association is awaiting FRA inspection outcomes for 20 stairs and will set plan review and formulation of inspection regime with PS and HM team – due for presentation to Board Feb 2021.	February 2021	To be developed from Tenant and Resident Safety Strategy Action Plan 2021 -2022
2	Some tenanted properties are out with their gas servicing review date due to Covid-19.	2	The Association ensure that the delayed properties are monitored closely and regularly reported on. Risk assessments should be performed to determine if forced access is acceptable procedure. These properties should also be	Scot Govt guidance now indicates that we should proceed (10 Sept update) to service. Figures, and measure of progress with the 3 cases will be included in October Board KPIs and for Assurance Statement.	October 2020	Completed

			reported to the SHR via the notifiable events portal.	Notifiable event – Interests and safety – non completion of valid gas service visit within 12 months- threat to tenant safety. We are tabulating the information on the 3 properties and this will form Board report KPI. We will input this information as a Notifiable Event on the SHR Landlord Portal.		
3	The Associations Asbestos Management Plan is dated 2016 and as a result is past its review date.	3	The review cycle of the Asbestos Management strategy be maintained.	Asbestos Management Plan to be reviewed – review was held back to get audit input (and Covid / staff resource) and will now be progressed with consultancy input – currently seeking recommendations for consultants. Presentation to Board anticipated January 2021.	January 2021	Timetable to be confirmed, consultant appointed Q2 2021 - 2022

4	<p>The asbestos register shows a number of properties requiring re-survey. Where recommendations were raised as a result of the surveys, there was no evidence of these being re-inspected. There is the possibility that the register requires update to reflect current level of inspections.</p>	2	<p>The update of the Asbestos register and its progression to office 365 be completed timeously.</p>	<p>Asbestos Register – showing requirement for reappraisal / re survey. This requirement will be reviewed with Consultant and relevant and achievable process documented and rolled out. Programme of re-survey if necessary will be planned. Presentation to Board anticipated January 2021.</p>	January 2021	<p>Timetable to be confirmed consultant appointed Q2 2021 – 2022</p>
5	<p>The Association issues contractors with copies of the Asbestos register. The auditor reviewed evidence of pre-start meetings that demonstrated the</p>	2	<p>The asbestos register keep an up to date record of all contractors that it has been issued to.</p>	<p>Asbestos Register – resurrect register of issue to Contractors – specific properties or whole register. Review of style</p>	January 2021	<p>Office 365 document transfer in progress at Jan 2021.</p>

	register had been passed to contractors working on external painter works and bathroom replacements. The Asbestos register makes reference to the last copy of itself being issued in 2013.			and content of register to be undertaken by consultant. Presentation to Board anticipated January 2021.		
6	The Association does not currently have an electrical inspection access procedure/policy.	2	Due to the recent concerns around Covid-19 and the fact that EICRs will now become an inspection regime it is recommended that the Association document an access procedure and create a servicing programme to deal with gaining entry to homes to perform the EICR checks.	Electrical Inspection Access process – to be documented and followed (in line with Gas process), publicised to all tenants and commenced from January 2021. Kevin Stewart MSP has notified RSL deadline to move to 5 year inspections regime is now March 2022.	January 2021	To be developed from Tenant and Resident Safety Strategy Action Plan 2021 -2022

Tenant and Resident Safety Strategy Appendix 4

Tenant and Resident Safety Related Policies revision dates

POLICY	Current Version	Review Date	Action Required
Asbestos Management Policy	2016	2021	Consultancy appointment Q2 2021 / policy to be re-drafted
Estate Management Policy	2018	2023	
Electrical Checks	n/a	2021	Develop no access process and logging re-visits if not certified to 5 years
Fire Risk Assessments	n/a	2021	Develop draft
Gas Service No Access	2019	2024	Review staged lettering
Legionella Strategy	2016	2021	Consultancy appointment Q2 2021 / policy to be re-drafted

Tenant and Resident Safety Strategy Appendix 5

Action Plan – Updated 31 July 2021

Year	Area	Initiative	Measurement of	Timescale	Update	Responsibility
-------------	-------------	-------------------	-----------------------	------------------	---------------	-----------------------

			Success			
2021	ALL	Develop dashboard pie chart statistical reports on Tenant and Resident Safety Measures	Series of dashboard pie chart reports formulated	2021 / 2022	To be developed Q2	SMT /PSD
2021	ALL	Develop quarterly Board Report on Tenant and Resident Safety Management System KPI	Quarterly Board Reporting cycle established	2021 / 2022	Dashboard will be appendix to KPI report – first report Q3	SMT /PSD
2021	ALL	Develop Tenant and Resident Safety Strategy	Strategy document discussed and developed with Board	Q2 2021 / 2022	Legislation to be added, link to H&S Strategy, training – aim for August Board	SMT / PSD
2021	ALL	Staff training and competency to be addressed in all tenant and Resident Safety policy	Clause included in all Policy documents	Q1 2022 / 2023		SMT
2021	ASBESTOS	Appoint Asbestos Management to assist with policy and system review	Consultant Appointed	Q1 2021 / 2022	Consultant appointed through SPA framework – pre start meeting planned August 2021	PSD / Prop Services Team
2021	ASBESTOS	Asbestos Reports moved to O365 sharepoint location	Asbestos reports available for access by Contractors and Consultants	Q2 2021 / 2022	Will be responsibility appointed consultant	PSM / PCMC / PSAA
2021	ASBESTOS	Establish robust asbestos sample across all stock types	Agreed target % sample, gap reports arranged and progress monitored	Q2 2021 / 2022	Will be responsibility appointed consultant	PSM / Consultant
2021	ASBESTOS	Re-model asbestos management policy including HSE reporting mechanism	Develop policy following consultancy input	Q2 2021 / 2022	Will be responsibility appointed consultant	PSD / PSM
2021	LEGIONELLA	Appoint Water Safety Consultant to assist with policy and system review	Consultant Appointed	Q1 2021 / 2022	Consultant appointed through SPA framework – pre start meeting planned August 2021	PSD / Prop Services Team
2021	LEGIONELLA	Review legionella risk assessment across stock	Work from consultant feedback	Q2 2021 / 2022	Will be responsibility appointed consultant	PSD / PSM

		base, shared common tanks, community buildings and office base				
2021	LEGIONELLA	Review legionella certification and storage records	Populate to common file structure	Q2 2021 / 2022	Will be responsibility appointed consultant	PSM / PCMC / PSAA
2021	LEGIONELLA	Prepare specification for legionella testing re-tender	Tender document drafted	Q2 2021 / 2022	Will be responsibility appointed consultant	PSD / PSM / Consultant
2021	FIRE SAFETY	Review SFRS website for Personal Emergency Evacuation Plan Criteria for stock base	Responsibility checked and draft information prepared	Q3 2021 / 2022		HD / HM
2021	FIRE SAFETY	Review Scot Govt publications Practical Fire Safety Guidance for Existing High Rise Domestic Buildings 2019	Document reviewed and questions raised for discussion	Q2 2021 / 2022		PSD / PSM
2021	FIRE SAFETY	Review Scot Govt publications Practical Fire Safety Guidance for Existing Specialised Housing & Similar Premises	Document reviewed and questions raised for discussion	Q2 2021 / 2022		HD/ HM
2021	FIRE SAFETY	Review Scot Govt publications Scottish revision of the guidance note for existing fire doors August 2018	Document reviewed and questions raised for discussion	Q2 2021 / 2022		PSM / TIs
2020	FIRE SAFETY	Review total storey height Great Junction Street block	TI measurement of block (falls below high rise category)	Q3 2020 / 2021		TI
2021	FIRE SAFETY	Sprinkler system to be specified in all new build	Sprinkler system specified and costed	Q2 & Q3 2021 / 2022	Under consideration – technical and financial	PSD / POLHA Dev Agents
2021	FIRE SAFETY	Review 2019 Community Building FRA actions	All actions completed	Q2 2021 / 2022		PSM / TIs

2021	FIRE SAFETY	Review SFRS requirements for HMO	Review HMO guidance	Q3 2021 / 2022		PSD / PM / HD / HM
2021	FIRE SAFETY	Develop common stair inspection regime for combustibles	Quantify numbers for inspection and outline inspection tasks	Q2- Q3 2021 / 2022		PSM / HM
2021	FIRE SAFETY	Develop standard lettering and timetabling for removal of combustibles in common stairs	Draft template letters available	Q2- Q3 2021 / 2022		PSM /HM
2021	FIRE SAFETY	Explore SFRS assistance to remove and store goods causing nuisance	Liaise and discuss SFRS	Q2 2021 / 2022		PSM / HM
2021	FIRE SAFETY	Provide fire safety instructions for common blocks – stair noticeboards and individual leaflets	Draft instructions prepared and circulated	Q3 –Q4 2021 / 2022		PSM / HM
2021	FIRE SAFETY	Quantify common stairs with and without door entry mechanisms	Stair listing updated	Q1 – Q2 2021 / 2022	Listing prepared, analysis and cost projections commenced for Board update	PSM / PCMC
2021	FIRE SAFETY	Integrate smoke vent, dry riser and fire extinguishing equipment service contracts to asset database	Asset database updated with items	Q1 – Q3 2021 /2022	Ongoing – trial contract on system	PSM / PCMC
2021	FIRE SAFETY	Explore specification for replacement glazed and non glazed fire doors to flatted properties including closure mechanisms and latch mechanisms	Legislative and best practice requirements reviewed	Q2 2021 / 2022	Have established manufacturers meeting certification requirements.	PSM
2021	FIRE SAFETY	Develop door inspection regime	Discuss SFRS / SFHA landlord & factor responsibility	Q3 2021 / 2022	Fire door safety training has taken place.	PSD / PSM /FC
2021	FIRE SAFETY	Update tenant information packs for common stairs with fire fighting measures	Collate fire fighting measure contracts and establish properties	Q3 – Q4 2021 / 2022		PSM / HM / PCMC

2021	FIRE SAFETY	Consider numbering floors in stair redecoration schemes	Developed with painterwork contract specification	Q2 2021 / 2022		PSM / PCMC
2021	FIRE SAFETY	Review & list the common requirements noted in the sample FRA reports and outcomes of remedial works	Collate and review sample concerns, actions and costings, consider priorities	Q2- Q3 2021 / 2022		PSM / TIs
2021	FIRE SAFETY	Prepare FRA roll-out plan for all mixed tenure stairs and publicise to owners through web and newsletter and with 2021 accounts or consider leaflet when undertaking common stair inspection	FRA sample costing, content and actions available as example to owners	Q2 – Q3 2021 / 2022		PSM / FC
2021	FIRE SAFETY	Rules and risks for Bin Store Compounds	Locking, uplift schedule and inspection cycles established	Q2 – Q3 2021 / 2022		PSM / HM
2021	FIRE SAFETY	Smoke detection remote trigger in attics with Solar panels and enclosed bin stores	Specify and install	Q4 2021 / 2022		PSM / TI
2022	FIRE SAFETY	Review fire walls in common stairs and locked access	Concerns noted and investigated	Q1 2022 / 2023		PSM/ TI
2022	FIRE SAFETY	Method to manage life style concerns	System of highlight / lettering and follow up- trip hazard, hoarding, littering concerns	Q1 2022 / 2023		HM / HO
2021	SMOKE and CARBON MONOXIDE DETECTION	Servicing arrangements built into gas contract and separate contracts arranged for no heat and electric heat properties	Gas servicing contract terms adjusted Completed	Q1 2021 / 2022	Contracts in place for gas properties, no heat and electric heat properties in progress, arrangements progressing, to be finalised	PSM / PCMC
2021	SMOKE and CARBON MONOXIDE DETECTION	Information on Scot Govt requirements to owners	Newsletter and web articles giving information and signposting links.	Q2 2021 / 2022	Article prepared and included in summer newsletter due for issue late August 2021	PSM / PCMC / FC

2021	TOXIC GASSES, RADON AND METHANE	Develop procedure statement on when and how any instance of or protection from toxic gasses, radon and methane will be investigated, including risk management	Procedure statement and link in risk management strategy	Q4 2021 / 2022		PSD
2021	HMO	Review HMO licensing legislation for compliance	Register of HMO properties and Compliance recorded	Q3 2021 / 2022		HD/ HM / PSM