

CLYDEBANK HOUSING ASSOCIATION LIMITED

To: Management Committee

From: Acting Housing Services Manager

Subject: **Health and Safety/Compliance Report**

Date: 29 June 2021

Purpose of Report

The purpose of the report is to update and inform the Management Committee on our compliance with our legal obligations on employee and tenant/resident safety, to allow consideration of the information and any recommendations and arrive at decisions where required.

Potential impact on tenants and service users/Tenant Consultation requirements

Failure to comply with our legal obligations could result in potential endangerment of employees, tenants and residents.

Value for Money

CHA considers Value for Money in all aspect of its business including: -

- Managing our resources to provide quality services and homes to meet the needs of customers and the local community.
- Delivering the right service at the right time at the right cost.
- Planning for and delivering year on year improvements on our services based on customer priorities.
- Getting the most out of our assets and staff by operating efficiently and effectively.

Risk

Non-compliance with statutory legislation could result in a notifiable event to the Regulator, intervention by the Regulation and/or intervention by the Health & Safety Executive resulting in fines or prosecutions.

Legal/constitutional Implications (Reference to Model Rules)

Relevant legislation, e.g. Building (Scotland) Regulations 2004, Health & Safety at Work etc. Act 1974, Control of Asbestos Regulations 2012, Electrical Equipment (Safety) Regulations 1994, Fire (Scotland) Act 2005, Gas Safety (Installation and Use) Regulations 1998, Lifting Operations & Lifting Equipment Regulations (LOLER) 1998, the Control of Substances Hazardous to Health Regulations 2002, Corporate Homicide Act 2007.

There are no adverse legal implications as a result of this report and/or any decision required.

Relevant CHA Objectives:

- To provide quality, affordable housing that meets the changing needs of our customers and to ensure fair access to housing within our area.

- To provide a first class maintenance service which offers value for money and ensures the comfort and safety of our residents while maintaining high levels of satisfaction.
- To ensure local decision-making and community control, we will encourage our tenants and other customers to influence our policy and participate in decisions, which may affect them.
- To ensure that our resources are adequate to deliver our objectives by investing in our people, demonstrating value for money and through robust procurement practices.
- To promote social inclusion by applying principles of equality and diversity to everything we do.

Relevant Scottish Social Housing Charter outcomes:

- Equalities - Social landlords perform all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.
- Communication - Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.
- Participation - Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.
- Housing quality and maintenance – Social landlords manage their businesses so that tenants' homes, as a minimum, meet the Scottish Housing Quality Standard (SHQS) when they are allocated; are always clean, tidy and in a good state of repair; and also meet the Energy Efficiency Standard for Social Housing (EESH) by December 2020.
- Repairs, maintenance and improvements – Social landlords manage their businesses so that tenants' homes are well maintained, with repairs and improvements carried out when required, and tenants are given reasonable choices about when work is done.

Relevant SHR Regulatory Standards of Governance and Financial Management

- The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.
- The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. And its primary focus is the sustainable achievement of these objectives.
- The RSL manages its resources to ensure its financial well-being while maintaining rents at a level that tenants can afford to pay.
- The governing body bases its decision on good quality information and advice and identifies and mitigates risks to the organisation's purpose.
- The RSL conducts its affairs with honesty and integrity.
- The governing body and senior officers have the skills and knowledge they need to be effective.

The Management Committee will require to confirm that the contents of this report and decisions required do not constitute a breach, material or otherwise, of the above Standards and there is no requirement to report a Notifiable Event to the Regulator.

1.1 **Employer Health & Safety Control Manual – Version 3**

An electronic version of the manual can be found on the intranet. A hard copy is also kept in the Board Room.

The manual is divided into the following sections:

- Policy and organisation
- Buildings
- People
- Work carried out by employees
- Work carried out by external contractors
- Sheltered housing
- Appendices

Please contact me directly if you wish clarification on any of the items contained within the manual.

As per previous training, the Management Committee is aware of its duties outlined within the Health and Safety Control manual and have signed relevant sections of the manual to confirm this in November 2020. A copy of the health and safety control manual has been sent to all members, due to COVID-19 we ask that members acknowledge that they are aware of the responsibilities noted within via e-mail before the end of the current month. An electronic version of this manual can be found on the intranet. A hard copy is also kept in the Board Room.

Intranet

There is a dedicated Health & Safety tab on the intranet. Within this location the following folders can be found:-

- Employee Handbook
- Control Manual
- Risk Assessments
- Policies
- Disaster Recovery Plan
- Advice Notes
- Training Notes

Management Committee and staff are encouraged to check this section of the intranet on a regular basis for up to date information / advice on health and safety matters.

Personal Protective Equipment (PPE)

The Covid-19 outbreak has resulted in us having to supply staff with more PPE than usual. At present we have adequate stocks of the following and an ongoing inventory is being prepared to ensure we maintain our stock by re-ordering timeously.

- 3 ply face masks
- Boiler suits

- Alcohol hand gel
- Shield Masks
- Latex Gloves

In accordance with the updated RAMS goggles and latex gloves are not a requirement for staff to use for general duties as both can increase the risk of the virus spreading through touch. These items however will be available to staff for situations which require enhanced protection such as administering first aid.

1.2 Updates

At present no updates have been received or uploaded to the EVH website, CHA staff will continue to monitor this and make any changes to the Control Manual once updates are required.

The document is reviewed on an annual basis and updated with all members of the Management Committee and relevant CHA staff.

1.3 Landlord Safety Manual

As per previous training, the Management Committee is aware of its duties outlined within the Landlord Safety manual.

The document is reviewed on an annual basis and updated with all members of the Management Committee and relevant CHA staff. The manual was last updated in November 2019 and will be updated prior to the anniversary date.

1.4 Training

The majority of this year's scheduled training, detailed below, was placed on hold until the Covid-19 restrictions were eased and training facilitators return to work. Where possible training sessions are being carried out using digital formats, the following training sessions have now been completed;

- Electrical Awareness (iHASCO) – PATH Trainee, Clerical Assistant and Maintenance Assistant.
- Asbestos Awareness (iHASCO) – PATH Trainee.
- Coronavirus Awareness (iHASCO) – Caretakers.
- COSSH (iHASCO) – Caretakers, Caretaker Supervisor.
- Legionella Awareness (iHASCO) – Clerical Assistant
- Working at Height (iHASCO) – Caretaker Supervisor
- Returning to Work During/After COVID-19 (iHASCO) – All staff.
- How to Manage Asbestos – Maintenance Assistant

In addition to the above enquiries have been made with regards to the following training courses;

- NEBOSH (General Certificate) – Acting Housing Services Manager and Officer
- Asbestos Awareness Minor Works – Maintenance Assistant

- Gas Safety Awareness – Maintenance Officer, Maintenance Assistants and Admin Assistant (Originally booked however course was cancelled by course provider).

Staff members will be booked onto courses as soon as they become available.

2.0 CHA non-domestic premises (Office, SEC, Centre81 and CHP Station)

The following works/testing/inspections were last carried out in April.

<u>Description</u>	<u>Location</u>	<u>Results</u>
Water Temperature Testing	Radnor Park	Satisfactory
Legionella Tests	Radnor Park	Satisfactory
Water tank cleaning	Radnor Park	Satisfactory
Water Temperature Testing	Social Economy Centre	Satisfactory
Legionella Tests	Social Economy Centre	Satisfactory
Water Temperature Testing	Centre81	Satisfactory
Legionella Tests	Centre81 Gents Showers	Satisfactory
Legionella Tests	Centre81 - All Other Outlets	Satisfactory
Water Temperature Testing	CHA Office	Satisfactory
Legionella Tests	CHA Office	Satisfactory

2.1 Accident & Near Miss Register

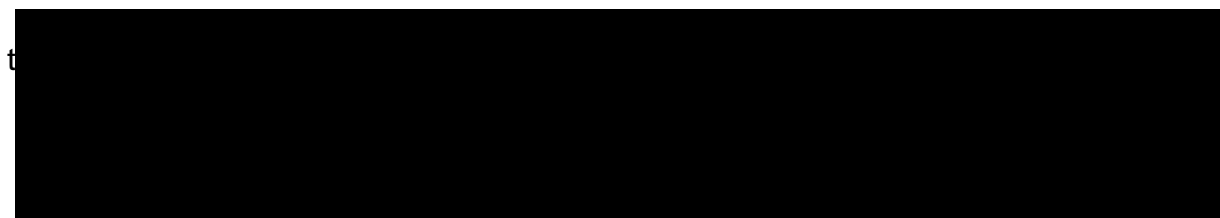
The Association complies with the duty placed on it by legislation to inform the appropriate authorities of any persons injured whilst carrying out work performed for or on behalf of the Association. In this regard accurate records of all accidents, incidents and “near misses” arising are maintained.

Any such accidents or near misses, whether reportable to the enforcing authority or not, will be notified to the Committee on a monthly basis.

No accidents have been recorded since the previous meeting.

3.0 Landlord

Public Liability Claims



3.1 Risk Management & Compliance

This section of the report covers the 6 main landlord compliance subjects i.e. fire safety, asbestos management, water systems management, electrical safety, gas safety, lift safety. This report should be read in conjunction with the Health and Safety Compliance Report in light of Covid-19. These headings will appear on each monthly report with updates or actions when applicable.

We have adopted the model policies within the Landlord Safety Manual on these subjects, however we are now developing standalone, CHA specific policies.

3.2 Fire Safety

Fire Risk Assessments at Multi-Storey Flats

The original fire risk assessment was carried out at Lusset View in July 2017.

A number of recommendations contained within that assessment have been programmed into our major repairs programme from 2019-2026 as follows:

- Common fire doors – Commencing in 2020/21 over 3 years
- Flat entrance doors – Commencing in 2020/21 over 3 years
- Installation of smoke alarms in roof space & laundries –In progress.
- Landing carpets – Programmed for replacement in 2026
- Raised thresholds at some escape routes – will be incorporated in common fire door renewal contract
- Burn damage to lights in stairwells – individual fittings being replaced as required

The above will remain on the monthly report until each action has been completed.

Leven View

As reported previously a fire risk assessment was carried out by ACS on 25 September 2019. All recommended actions have now been completed.



Castle View

Fire Action Plan - Castle View				Work outstanding

Works noted above that was due to be complete June 2021 – all labels will be put on the distribution board and the fire extinguishers on Monday 28/06/21.

All works previously reported with regards to Cart Street, Glasgow Road and Graham Avenue sites following fire risk assessment have been completed.

Smoke, heat and carbon monoxide alarms systems – total installations due 1026

The first phase was split into two lots awarded as follows:

Lot 1 – Multi-storey flats (391 properties) + (7 communal) – City Technical Services

Lot 2 – All other properties (480) – Belac Group (Contract Complete)

Between 2 March 2020 and 30th May 2021 these contractors fitted a total of 780 systems, including the additional Radnor Park communal system. This leaves 98 still to be fitted. All properties within the contract have been visited a minimum of twice. As per the contract Belac Group have since notified the Association of charges to be invoiced for future no access attempts, as such an agreement has been reached to close off this contract and works will now be completed by City Technical Services during programmed maintenance works such as major repairs, gas services and unvented hot water cylinder checks. The maintenance team are currently working with City Technical Services in order to arrange access with the remaining tenants.

There are a further 148 systems are to be installed in properties as part of a rewiring contract. A programme of work is due to commence in the near future with pre-surveys currently being carried out.

To summarise there are 1,026 systems to be fitted with 780 completed to date i.e. 76.02%.

The legal deadline for fitting these systems in our properties has been extended by the Scottish Government to February 2022. Following discussion with the contractor works have been placed on hold until COVID-19 restrictions are lowered with the exception of void properties or where current system.

The legal deadline for fitting these systems in our properties is February 2022. Contractors carrying out the works have been made aware of the Association's requirements and have confirmed that they have the capacity to complete these works prior to the deadline.

Scottish Fire & Rescue Service

Scottish Fire & Rescue carry out periodic inspections at the multi-storey flats to check the dry risers, emergency lighting, common fire doors etc. and advise us if there are any deficiencies that require to be rectified.

No reports were received in May.

Cyclical Testing & Inspection

The following testing and inspections took place during May 2021:

- Lift Servicing & Maintenance – Radnor Park
- Water temperature testing – Radnor Park
- Inspection and clean of Thermostatic Mixer Valves – Radnor Park
- Monthly temperature testing – CHA Office
- Monthly temperature and legionella tests – Social Economy Centre
- Monthly temperature and legionella tests – Centre 81
- Service of smoke windows – Glasgow Road/Hume Street

Evidence of fire safety compliance by scheme/block/unit is stored in this location:

[..\\..\\..\\Maintenance Folder\\Landlord Compliance](#)

3.3 Asbestos Management

All required surveys have now been completed and received with the results incorporated into our Asbestos Register.

As reported previously 4 of our 33 schemes have low risk, good condition asbestos containing materials (ACM's) e.g., external cement window sills and these are being monitored and will be re-inspected on an annual basis. All inspections for the current year have now been completed.

Evidence of asbestos compliance by scheme/block/unit is stored in this location:

[..\..\..\Maintenance Folder\Landlord Compliance](#)

3.4 Water Systems Management

The section deals with the effective inspection, maintenance and management of all water systems within premises controlled by the Association and mainly covers Legionella.

We have a cyclical programme in place which covers the above and have now enhanced procedures in line with our Legionella Policy to include testing and risk assessments in void properties.

Domestic Properties

HBE Ireland Ltd have now commenced a water management programme throughout the stock. No issues have been identified and all monthly, bi-annual and annual targets have been met throughout the stock.

Evidence of water systems compliance by scheme/block/unit is stored in this location: [..\..\..\Maintenance Folder\Landlord Compliance](#)

3.5 Electrical Safety

There are various inspections required to ensure our landlord compliance both in common areas and individual properties. Details of what we carry out and the frequency required are as follows:

Multi-storey flats

Lightning protection – 12 months

Emergency lighting (3 hour failure simulation) – 6 monthly

Emergency lighting (battery strength test) – 6 monthly

Changeover of emergency lighting from mains to battery - monthly

Laundries – 12 months

Common service areas – 36 months

Domestic tenanted properties

Electrical Installations Condition Report (EICR) – 5 years

Void properties & mutual exchanges

EICR – at every change of tenancy

Unvented hot water cylinders (properties with Quantum heating) – 12 months

Portable appliance testing (office, C81, SEC & caretakers offices) – 12 months

Cyclical Testing & Inspection

A contract has now commenced for all electrical inspections due to be completed on or before March 2021. The contractor has progressed works throughout lockdown restrictions however a number of tenants have thus far refused access. The Association will assist the contractor to gain access to these properties and record evidence in order to submit abeyances against SHQS within this year's ARC submission.

Evidence of electrical safety compliance by scheme/block/unit is stored in this location: [..\..\..\Maintenance Folder\Landlord Compliance](#)

3.6 Gas Safety

We currently have a framework agreement in place with City Technical Services for reactive and servicing maintenance of all properties with a gas appliance.

City Technical operate a 24/7 service for breakdowns involving no heating or hot water. They also carry out annual services (within 365 days of previous service). During an annual service to any gas appliances they also check the carbon monoxide, smoke alarms and heat detectors where fitted.

The new reporting year started on 1 April 2021 and we have had 0 services out with target due.

Due to current restrictions and concerns over safety of tenants and engineers, City Technical Services have informed the Association that the number of gas services being carried out per day is being reduced. The Association continues to carry out its procedures in full and do not anticipate any failures within the year or beyond.

Evidence of gas safety compliance by scheme/block/unit is stored in this location: [..\..\..\Maintenance Folder\Landlord Compliance](#)

3.7 Lift Safety

We currently have a framework agreement in place with Jackson Lift Group to maintain all our passenger lifts. There are 16 lifts in total, 14 at the multi-storey flats, one at Centre81 and one at the Social Economy Centre.

The contract involves one maintenance/service visit to each lift per month. Each lift is fitted with a telephone line and if a customer presses the emergency button in the event of a breakdown or entrapment the call goes directly to Jackson Lifts who are required to attend within one hour. There is also an "out of hours" service and reactive repair service for any works out-with the contract.

In addition to the above, our insurers arrange for an independent company to inspect all lifts twice a year, in essence to audit the work of our contractor. We receive reports of these audits and any recommended works are passed to our contractor to implement.

Cyclical Testing & Inspection

All monthly maintenance service inspections have been completed and inspections have been programmed to be carried out on a monthly basis for the duration of the contract.

Evidence of lift safety compliance by scheme/block/unit is stored in this location:

[../../../../Maintenance Folder/Landlord Compliance](#)

4.0 Landlord Compliance Update

The landlord compliance report has now been incorporated into the Health and Safety report in order to streamline the reporting of health and safety issues. A copy of the report

	Area	Legislative/ Regulatory Requirements	Complying as of date of report (Y/N)	Details if not complying	Current Risk High/ Medium/ Low	Mitigation Strategy/Plans (if applicable)
1	Fire	<ul style="list-style-type: none"> • Dry riser testing • Inspections of common areas • Servicing of fire vent windows • LD2 Smoke & Heat Alarms 	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<ul style="list-style-type: none"> • N/A – all tests being carried out as required • N/A • N/A • The legislation relating to these installations does not come into effect till Feb 2022. 	Low-Medium	<ul style="list-style-type: none"> • Dry risers testing carried out in October 2020 and April 2021. Carried out on bi-annual and annual basis. • Scottish Fire & Rescue carry out regular inspections as do caretaking staff on a daily basis • Fire Protection Group regularly service • LD2 (Smoke alarm) upgrades. • LD2 (Smoke alarms) upgrades to properties during rewiring works being monitored closely to

						ensure completion prior to deadline.
2	Gas	<ul style="list-style-type: none"> Annual gas safety services 	Y (Previous non-compliance)	<ul style="list-style-type: none"> 0 Failures to date 	Low	<ul style="list-style-type: none"> Procedures being followed out in full. Safe working practices in place to allow procedures to be followed during all stages of restrictions.
3	Water Systems/ Legionella	<ul style="list-style-type: none"> Monthly inspections, temperature testing and legionella/ visual inspections of tanks Quarterly/bi-annual/annual inspections 	Y	<ul style="list-style-type: none"> All monthly inspections at multi-storey flats recommenced on 22nd June 2020 and are now being carried out in line with requirements identified in updated RAMS. All monthly, quarterly, bi-annual and annual inspections are now up to date. 	Low	<ul style="list-style-type: none"> Contractor sourced from SPA framework has now commenced program of works. A second contractor has been sourced and is being used for monthly checks at Radnor Park. If required this contractor can be used as a back-up going forward.
		<ul style="list-style-type: none"> Random checks in individual multi-storey flats 	Y	<ul style="list-style-type: none"> Random checks in individual multi-storey flats have now been carried out on a monthly basis since 22 June with COVID-19 control measures in place. 	Low	<ul style="list-style-type: none"> Full programme of work being carried out. Safe working practices in place to allow works to be carried out in full during all stages of possible restrictions.
		<ul style="list-style-type: none"> Risk assessments in void properties 	Y	<ul style="list-style-type: none"> New contractor has been carrying out risk assessments in current void properties as required. 	Low	<ul style="list-style-type: none"> Legionella risk assessments have now been carried out in all void properties. CHA staff are now completing assessments and arranging works in all void properties.

4	Electrical	<ul style="list-style-type: none"> • Electrical inspections in common areas at multi-storey flats • Electrical inspections in void properties 	<p>Y</p> <p>Y</p>	Electrical inspection programme was placed on hold due to COVID-19 concerns. Work restarted on 22/02/2021 in line with government guidance.	Medium	<ul style="list-style-type: none"> • Properties that do not have an electrical safety certificate within last five years will be subject to a failure in next year's ARC submission. • A contractor has been appointed and is progressing towards completion of all outstanding or due electrical inspections.
5	Lifts	<ul style="list-style-type: none"> • Monthly servicing and safety checks 	Y	N/A – all checks being carried out as required	Low	<ul style="list-style-type: none"> • Contractor is responding to cyclical and reactive calls as normal and remains unhindered by restrictions.
6	Asbestos	<p>Management and refurbishment surveys</p> <ul style="list-style-type: none"> • Annual re-inspections 	<p>Y</p> <p>Y</p>	<p>Inspections have now re-commenced as required within CHA properties</p> <p>N/A</p>	Low	<ul style="list-style-type: none"> • CHA now have access to asbestos surveys as contractors staff returned from furlough. • Annual inspections completed.