



North Devon Homes

Cyclical Maintenance and Compliance Policy

Contents		Page
1	Purpose	2
2	Principles	2
3	Review	2
4	Responsibilities	3
5	Scope	3
6	Policy Statement	4
7	Consultation	14
8	Equality Impact Assessment	14

1 Purpose

North Devon Homes (NDH) is committed to providing a customer focused cyclical maintenance and compliance service that ensures our rented properties and office facilities are safe, comfortable and well maintained

To achieve value for money and strive for the continual improvement in the delivery of those services

To shape our service delivery around the diverse needs of our customers

To comply with legislative and regulatory obligations and Health and Safety Legislation and Guidance.

2 Principles

The following principles will apply to this policy:

It will be open, fair and transparent

It will reflect the current standards of operation and will be reviewed whenever industry standards, legislation or guidelines change

It will promote consistency in the approach to cyclical maintenance services

It will be positively promoted with regard to informing the company's, staff, customers and board members views and behaviour

It will be realistic, achievable and provide value for money

It will be periodically reviewed as set out in section 5

It will support corporate objectives and service standards.

3 Review

We will review this policy at least once every three years or immediately following any relevant change to government policy, regulation or legislation. This will ensure that it continues to operate within best practice, achieve measurable results, and achieve continuous service improvement.

The Head of Asset Management will be responsible for ensuring that policy reviews are undertaken, that appropriate consultation takes place and that revisions are reported to the Board for its approval.

4 Responsibilities

The Executive Team will approve this policy under delegated authority from the Board. The Head of Asset Management and The Head of Regeneration and Development will be responsible for ensuring that this policy is communicated and implemented.

Detailed procedures will be developed and maintained by the Cyclical and Compliance Manager in line with this policy to provide further guidance to the delivery of the policy to ensure accurate recording and data management of assets and compliance records.

The Head of Regeneration and Development will be responsible for ensuring that all servicing requirements are completed prior to handover of new build properties to the Cyclical and Compliance Team once the responsibility becomes the ownership of the Asset Management Team. At this time they must ensure that all necessary records and details are provided setting out the servicing requirements and frequencies. They are also responsible for the servicing of all non residential facilities including Head Office.

The Head of Asset Management is responsible for compliance relating to all social rented properties and related communal areas and for ensuring that staff training is provided and that staff understand the wider issues surrounding this policy, its applications and the procedure. The Head of Asset Management is also responsible for compliance where the properties were previously social rented but have been subsequently acquired through the Right to Buy and/or Right to Acquire but the freehold has been retained.

5 Scope

Assets Maintained Under Cyclical Servicing Agreements

The Cyclical Maintenance Policy covers the provision of servicing or other routine compliance checks for all social rented properties within NDH stock for the following asset components:

- Air Conditioning
- Biomass
- Carbon Monoxide monitoring equipment

- Emergency Lighting
- Fire Alarms
- Fire Fighting Equipment
- Heat Pumps
- Legionella Monitoring , Cleaning and Mixer Valves
- Laundry Equipment
- Passenger Lifts / Access Platforms
- Periodic Electric Testing
- Portable Appliance Testing
- Positive Air Ventilation Systems
- PV Panels (including solar thermal)
- Radon Testing
- Unvented cylinders
- Rainwater Harvesting
- Septic Tanks and Sewage treatment plants
- Smoke Alarms
- Water Filtration systems

Please note:

This policy does not cover the provision of gas servicing and safety checking to both domestic properties and commercial properties which is covered under the Gas Safety Policy (HP175). Nor does it cover the solid fuel and oil servicing which is covered under The Solid Fuel and Oil Installations Policy (HP 307).

6 Policy Statement

6.1 Air conditioning

Air conditioning units will be serviced every twelve months and the installation and servicing will conform to BS EN 14511 and BS7671. We currently have air conditioning units within our office facilities and within one social rented block of flats.

The servicing will take place at intervals not greater than twelve months.

6.2 Biomass

Biomass boilers will be serviced every twelve months and the installation and servicing will conform to manufacturers' recommendations.

6.3 Carbon monoxide monitoring equipment

Carbon Monoxide Alarms will be tested and inspected on an annual basis. All alarms installed will comply with BSEN50291

North Devon Homes install Carbon Monoxide alarms in all properties with heating types that burn combustible materials and could produce Carbon Monoxide fumes. All alarms will be tested annually, inspected and replaced on a routine basis.

Where access is not granted for the servicing inspections NDH will follow their 'No Access procedure' to obtain access to complete the necessary inspection and ensure customers' homes remain safe.

Expiry dates for all carbon monoxide alarms are captured at the inspection visit and a programme to replace alarms prior to the expiry date is in place.

6.4 Emergency lighting

Emergency lighting installations will be serviced and tested for their full rated duration annually and their installation and servicing will conform to BS5266-1:2016 and BS767. Emergency lighting systems will also be tested for operation on a monthly basis.

For the annual discharge test it is our preference to undertake this to 25% of an installation on a quarterly basis, ensuring that every emergency light within a block is tested once annually.

All testing will be recorded in our asset management database.

6.5 Fire alarms

Fire alarm installations will be inspected and serviced every six months as a minimum and their installation and servicing will conform to BS5839-1. The inspection and testing will be recorded in our asset management database.

Weekly testing is also completed and recorded on our asset management database.

6.6 Fire fighting equipment

The fire fighting equipment will be serviced every twelve months and their installation and servicing will conform to BS5306-3:2017

Fire fighting equipment includes fire extinguishers, fire hose reels and fire blankets.

Due to the concerns about the growth of Legionella bacteria within fire hose reels and their difficulty of use by residents, the Company has phased these out replacing them, where necessary, with fire extinguishers.

NDH has more recently reduced the amount of fire extinguishers within our communal areas on the advice of our fire risk assessors. Fire extinguishers will be only located in high risk rooms such as boiler rooms or in an office facility where staff have received training in their use.

The servicing will take place at intervals not greater than twelve months.

6.7 Heat Pumps

Heat pump units will be serviced every twelve months and the installation and servicing will conform to manufacturers' recommendations.

Air Source Heating Units, unvented water cylinders and ground source heat pumps will be serviced every 12 months by a competent contractor.

Where access is not granted for the servicing inspections NDH will follow their 'No Access procedure' to obtain access to complete the necessary inspection and ensure customers' homes remain safe.

6.8 Legionella monitoring

NDH has duties under the Health and Safety at Work etc. Act 1974 which extend to risks from Legionella arising from work activities, and also duties under the Control of Substances Hazardous to Health Regulations 2002 which relates to risks from biological hazards such as Legionella.

North Devon Homes' policy for Legionella monitoring follows the Health and Safety Commission's Revised Approved Code of Practice and Guidance on Legionnaires' disease (L8) 'Legionnaires Disease: The Control of Legionella Bacteria in Water Systems'.

Job roles that hold responsibility for the control of Legionella are as follows:

- Duty Holder – Chief Executive*
- Responsible Person – Head of Asset Management*
- Deputy Responsible Person – Cyclical and Compliance Manager*
- Monitoring Person will be both the contractor employed to carry out the testing and monitoring contract and our in house Asset Contracts Coordinator*

The ACoP (Approved Code of Practice) L8 provides guidance on standards that must be met in order to comply with the legal requirements for dealing with the risks from Legionella bacteria. It applies whenever water is stored or used in a way which may create a foreseeable risk of Legionellosis and particularly to the following water systems:

- cooling systems with cooling towers, evaporative condensers or dry/wet cooling systems;*
- (b) hot and cold water systems;*
- (c) spa pools;*
- (d) other plant and systems containing water that can create and increase the risk from legionella during operation or when being maintained.*

It should be noted that the greatest risk for Legionellosis is found in situations where cooling towers or evaporative condensers exist. This being the case, NDH has no high-risk areas. A risk however exists in hot and cold water services, including showers, particularly within our older person schemes, and this is identified as the main area of risk for NDH.

NDH will as far as reasonably practicable:

- Identify and assess the sources of risks
- Prepare schemes for preventing/controlling such risks
- Implement and manage suitable precautions
- Keep records of precautions implemented
- Appoint a person who is managerially responsible for the system.

Legionellosis will be prevented and controlled as follows:

- Eliminating conditions, which permit the proliferation of Legionella bacteria
- Minimising the creation and release of water sprays and aerosols.

Precautions which limit the proliferation of Legionella species include:

- Avoiding water temperatures between 20°C and 45°C
- Avoiding water stagnation
- Avoiding the use of materials in the system, which harbour or provide nutrients for bacteria
- Keeping the system clean to avoid the build-up of sediments which could harbour bacteria
- Using a suitable water treatment programme which involves disinfection and maintenance of the system
- Ensuring that the system operates safely and is well maintained.

NDH has five sites with communal hot and cold water storage systems (3 housing schemes, Head Office and Whiddon Valley Community Centre) which have been identified as sources of risk. Processes have been prepared to control the risk and monitoring is undertaken on a monthly basis to control the risk. Records are held by the Asset Management Team and the Head of Asset Management is managerially responsible for the system of control.

Remedial Actions noted at monthly visits and following risk assessments will be complete within the suggested timescales set out by the monitoring contractor. Completion of any remedial actions will be monitored by the Cyclical Maintenance and Compliance Manager on a monthly basis.

There is also a potential risk within all of our properties and we will assess these risks and reduce through:

- Improved information about legionella to our customers

- A simplified Risk assessment completed by the plumbing contractor performed on our properties when they become void.

Thermostatic mixer valves within our sheltered schemes with communal water systems will be serviced every twelve months and their installation and servicing will conform to BS7942 and BS6700.

The servicing will take place at intervals not greater than twelve months. Exceptions will only be allowed where the customer does not provide access on this appointed visit. Supporting procedures outline the process to ensure that access is gained within two months of this initial attempt.

In domestic properties a risk assessment will be carried out on all properties whilst void, this will be completed by the appointed plumbing contractor. The risk assessment will result in a risk score being given to the water system. Any installation deemed to be of high risk will be reviewed to identify any opportunities to reduce or mitigate the risk. When customers sign up to their new home they are provided with information relating to legionella. This explains the customer's responsibilities and the measures they should take to reduce legionella risks in their home.

6.9 Passenger lifts / Access Platforms

In accordance with the Health & Safety at Work Act, 1974, NDH as Duty Holder will ensure the proper maintenance inspection and insurance of passenger and stair lifts in communal areas and any residential property let with lifting equipment in situ. NDH is not responsible for the maintenance of tenant owned stair lifts (the maintenance being the responsibility of the tenant).

The maintained lifts will be serviced in accordance with The Provision and Use of Work Equipment Regulations 1998 (PUWER). Maintenance intervals are dependent upon the lift type, age and usage (every 2, 3, 6 or 12 months). The servicing will be undertaken by the appointed competent lift servicing contractor and will conform to BS7255, BS EN 13015, BS7671, good working practices as defined by EITB (Engineering Industry Training Board) and LEIA (Lift and Escalator Industry Association).

Statutory Inspections will be carried out to satisfy the requirements of The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). The insured passenger lifts will be inspected every 6 months and the insured stair lifts will be inspected every 12 months. The inspections will be undertaken by the Insurance Inspector (competent person) appointed by the insurance company as nominated by NDH. The inspection report may call for supplementary tests in accordance with SAFed (Safety Assessment Federation) Supplementary Lift Examination Guidelines.

NDH will ensure that notified defects arising from the thorough inspection will be recorded and remedied in a timely manner and this will be monitored by the Cyclical Maintenance and Compliance Manager.

Customers wishing to install lifting equipment in their home will be required to adhere to NDH's permission process which provides guidance on the Health & safety issues. Following installation, customers will be responsible for maintenance and servicing regime and costs.

6.10 Laundry Equipment

Laundry equipment will be serviced every twelve months and the installation and servicing will conform to Manufacturers' recommendations.

PAT testing for all laundry equipment will be completed annually.

Duct cleans to tumble dryers will be completed annually.

6.11 Periodic electric testing

NDH are working towards a goal of completing a 5 yearly programme of testing all electric installations for our domestic properties and communal areas. Testing and remedial works will conform to BS7671.

Our current programme has ensured that all of our installations have been tested within 10 years and all voids properties are tested prior to re letting. We are moving to a 5 year programme by the end of 2023 in accordance with our asset management strategy or sooner if we can achieve this.

NDH will ensure that notified defects arising from the periodic electrical inspection will be recorded and remedied in a timely manner and this will be monitored by the Cyclical Maintenance and Compliance Manager.

Where access is not granted for the servicing inspections NDH will follow their 'No Access procedure' to obtain access to complete the necessary inspection and ensure customers' homes remain safe.

6.12 Portable appliance testing

PAT testing will be carried out by a competent person on a routine basis in accordance with The IEE Code of Practice for In-Service Inspection and Testing of Electrical Equipment, 2007.

Electrical portable appliance testing (commonly referred to as PAT Testing) is a statutory requirement covering the annual safety testing of all portable electrical appliances owned by and provided for use by the landlord or employer. Appliances owned by customers or not supplied by the Landlord or Employer are not included in the testing programme.

NDH has portable appliances present in its offices, with its workforce and within the communal areas of its housing schemes. NDH does not supply portable appliances for use in its customers' individual properties. NDH will complete PAT testing as per the following:

Equipment Description	PAT Frequency
Laundry equipment (communal)	12 Months
Power tools	12 Months
Kettles, toasters desk fans, extension leads etc.	24 Months
Laptops, portable printers, kitchen appliances (communal and NDH)	36 Months
PCs and Printers	60 Months

The testing will take place in line with the table above. The Facilities Officer is responsible for ensuring that all portable appliances are tested.

6.13 Positive air ventilation systems

Positive air ventilation system installations will be serviced every twelve months and the installation and servicing will conform to Manufacturers' recommendations.

Access to complete the service will follow the normal access procedure however escalation to Legal proceedings will not be taken as the service visit is mainly to preserve the equipment and there are no associated Health & Safety risks.

6.14 Photovoltaic (PV) Panels

Photovoltaic panel installations will be serviced every twelve months and the installation and servicing will conform to Manufacturers' recommendations.

Access to complete the service will follow the normal access procedure however escalation to Legal proceedings will not be taken as the service visit is mainly to preserve the equipment and there are no associated Health & Safety risks.

6.15 Radon Testing and Monitoring

Radon is a colorless, odorless natural radioactive gas formed by the radioactive decay of the small amounts of uranium that occurs naturally in some rocks and soils. Due to the geological make-up of the South West the background levels of radon can be higher than those recommended.

UKradon recommends a 'target' level of 100Bq/m³ for new build homes and when designing remedial works to address radon levels. A recommended 'action' level of 200Bq/m³ where action should be taken.

North Devon Homes will undertake to test the radon levels in all properties built prior to 2000. This year is used as the cutoff point as at this point Building Regulations required new build properties to incorporate radon mitigation measures. During the first year of testing we will take 100 readings from across our stock to try and establish those that have a higher risk of exceeding the action level. Over the following 6 years we will test approximately 300 properties per year, on a risk based programme, until all properties built prior to 2000 have been tested.

For any properties that have results which are above the 'action' level of 200Bq/m³ remedial action will be undertaken to reduce the levels to 100Bq/m³ where reasonably practicable. After the remedial actions have been completed a re-test will be undertaken to confirm the effectiveness of the measures.

A record of all Radon test results will be maintained within the asset management database.

Because of the health risks associated with a reading above the action level of 200Bq/m³, NDH will make strong efforts to persuade the customer to accept remedial measures and inform them of the health implications of not doing so, but where refused, a written record of this will be maintained. The remedial works will then be completed next time the property becomes void.

6.16 Rain Water Harvesting

Rain Water Harvesting systems will be serviced every twelve months and the installation and servicing will conform to Manufacturers' recommendations.

Access to complete the service will follow the normal access procedure however escalation to Legal proceedings will not be taken as the service visit is mainly to preserve the equipment and there are no associated Health & Safety risks.

6.17 Septic tanks

Septic tanks will be emptied and the waste transferred to a licensed site as determined by the number of properties served and therefore usage. Work will conform to BS6297 and BS EN 12255.

NDH has septic tanks that it owns and maintains. There are also septic tanks serving NDH's properties which are owned and maintained by the land owner. NDH contributes to the cost of the maintenance on these tanks but does not arrange the maintenance.

6.18 Smoke alarms

NDH has installed hard wired smoke alarms into all but a handful of properties

The alarms will be serviced on an annual basis and their installation and servicing will conform to BS5446 and BS7671.

North Devon Homes has installed hard wired smoke alarms into all properties. Newer properties will also have heat detectors installed.

Where a property has a gas installation the smoke alarms will be inspected by the gas engineer at the time of the annual gas service. All other properties will have the alarms inspected by the electrical contractor. Only properties that are difficult to access are serviced at an interval greater than twelve months.

Where access is not granted for the servicing inspections NDH will follow their 'No Access procedure' to obtain access to complete the necessary inspection and ensure customers' homes remain safe.

Where a customer refuses to have smoke alarms fitted or serviced, they will be required to sign a disclaimer.

Should a customer damage a smoke alarm installation, they will be recharged for reinstatement as per the Company's recharging policy. Reinstatement will be completed at the time of discovery of damage or at a subsequent change of tenancy should the customer refuse to have the alarms reinstated. Recharging for reinstatement will be commenced at the time of discovery of damage regardless of whether reinstatement has or has not occurred.

Expiry dates for all smoke alarms are captured at the inspection visit and a programme to replace alarms prior to the expiry date is in place.

6.19 Water Filtration Systems

North Devon Homes has one property within its stock that is not on mains water and has a spring feed with a filter unit. The filter unit will be serviced annually. The system will also be assessed regularly by environmental health.

6.20 Appointments

The Company will use a range of contact methods including letters, phone calls, text messages, emails, visits by NDH staff as well as engineers in order to make the necessary appointments. Where possible NDH will try to arrange service visits to coincide with each other to reduce the number of servicing visits required.

Where cyclical maintenance requires access to our customers' homes, three appointed attempts will be made prior to taking alternative means such as legal letters or injunctions, where appropriate. Full explanation of the Company's methods for gaining access is provided in the supporting procedures.

Attempts to make contact with the customer will be cross departmental, to ensure that every avenue is explored to make contact with the customer. Where access in normal office hours is not possible, out of hours appointments will be offered to ensure that access is gained within the designated time frame.

Ultimate responsibility for completing the cyclical maintenance within the designated time period lies with the Head of Asset Management. Should all such attempts fail, then the Neighbourhood Officer will be responsible for seeking an injunction to gain access to the property. The exception to this is for gas servicing appointments in which case the action will be taken by the Asset Contracts Co-ordinator. This will be a last resort action.

6.21 Certification

Certificates will be provided following all cyclical servicing and inspections visits, these will be made available through the Keystone Asset Management database.

North Devon Homes will keep all such certificates for a minimum of two years and the Head of Asset Management will be responsible for maintaining these records.

6.22 Competent contractors and operatives

NDH uses contractors for all cyclical maintenance work. All contractors undertaking work will be checked for competency prior to their appointment.

The Head of Asset Management will be responsible for ensuring that all appointed contractors are checked for competency prior to their appointment.

6.23 Performance management

NDH will monitor the performance of its contractors through on site inspections and regular audit.

The Company will maintain a comprehensive asset database of all cyclical maintenance. Information relating to each servicing item will be provided to the relevant contractor at regular intervals, this information will be returned to NDH upon completion together with a copy of the servicing certificates. The Asset Management database will be maintained to capture all additions and removals of servicing equipment and assets.

The Company aims to ensure that at all times all cyclical maintenance is carried out at the intervals prescribed above. Regular monitoring of the Company's asset register and contractors' service schedules will be undertaken by the Head of Asset Management in support of this target. Any lapses will be reported immediately to the Executive Team and reported to the Board as appropriate.

Cyclical Maintenance Key Performance Indicators are reported on a quarterly basis to the Executive Team via the Company's Quarterly Performance Reports (QPR). All

properties where access has not been gained during the specific timescales are reported via the QPR with explanation of action taken/being taken.

7 Consultation

Who has been consulted in developing the Policy?

Date	Consultation methodology Responsive repairs Group	Challenge / impact / result

8 Equality Impact Assessment

8.1 Identify potential impact on each of the diversity “groups” by considering the following questions (the list is not exhaustive but an indication of the sort of questions assessors should think about):

Strand	No impact	Negative impact	Positive impact	Comments / evidence
Race	√			
Disability	√			
Gender	√			
Gender Reassignment	√			
Sexual orientation	√			
Religion or belief	√			
Age	√			
Rural issues	√			
Social Inclusion issues	√			
Pregnancy and maternity	√			
Marriage and civil partnership	√			

8.2 Does the Policy promote equality of opportunity?

All customers are entitled to the same service and all testing is subject to either Health and Safety Legislation or landlord liabilities as defined across a range of Acts of Parliament. Not relevant for this purpose.

8.3 If “adverse impact” identified in table (4) above is it?

Legal (i.e not discriminatory)

No

What is the level of impact?

Not applicable.

8.4 If actions /suggestions for improvement have been suggested, what should the positive outcome be for North Devon Homes’ customers and stakeholders?

Flexibility of the customer care aspects of the policy are contained within the Code of Conduct that is applied to all staff and contractors and all manager are empowered to adjust aspects of service delivery to ensure customer specific requirements are taken into account where they do not negatively affect the service programme.

This policy will be applied fairly and consistently to all tenants of North Devon Homes and in compliance with the Single Equality Act 2010 which recognises the “protected characteristics” as; gender, transgender, race, marital status, pregnancy and maternity, ethnic origin, nationality, disability, sexuality, age, religion and belief.

To this end an Equality Impact Assessment has been carried out on this policy and is attached as Appendix A.

We undertake to produce this document or parts of it on request in other languages or formats such as large print to ensure that everyone is able to access the policy.

Language Line provides all corporate translation services and they may be contacted on 0800 169 2879.

We are committed to the principles of fairness and respect at North Devon Homes and therefore seek to embed statutory guidance and policy relating to Equality and Diversity in to all activities.

Next review date:	Responsible Officer
Three years September 2024	Head of Asset Management
Author	Related Documents
Claire Fallow Head of Asset Management Claire.fallow@ndh-ltd.co.uk	