Prescribed Hazards in Housing Policy (HHSRS)

Approved by: Executive team

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You are advised that a printed version may not be the latest available version. The latest version, which supersedes all previous versions, is available on the BP Policy Index Sheet. Those to whom this policy applies, are responsible for familiarising themselves with the latest version and for always complying with the policy requirements.

Should colleagues require any reasonable adjustment to allow for engagement with this document please contact the policy lead

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1 Policy Statement and Purpose

The purpose of this policy is to set out the Health and Safety Management System (HSMS) framework by which Brighter Places (BP) will deal with 'prescribed hazards'[1] in customers' homes. It is intended to promote a proactive, best practice approach to the planning, prevention, and response to identified Health and Safety (H&S) risks within BP properties.

BP is committed to ensuring customers feel safe in their homes and communities. As such, we will minimise the risk of harm to the health and safety of customers through adequate design, construction, maintenance and repair of our assets, internal and external communal spaces and land.

BP recognises the age and diversity of our stock and the challenges this brings, but we aim to ensure that all properties meet minimum Decent Homes standards, are fit for human habitation, and are free of prescribed hazards in line with relevant legislation. Where this cannot be met through reasonably practicable and affordable upgrades properties will be put forward for options appraisal and potential disposal.

Failure to comply with this policy and procedure may lead to increased risks and significant moral, legal and financial consequences. This includes criminal and civil legal action and/or interventions by enforcing bodies. Failure to adhere to this policy and associated procedures by Brighter Places colleagues may result in disciplinary action or tenancy enforcement actions where it is deemed relevant (refer to BP Disciplinary Policy and Tenancy Agreement.)

2 Policy commitments

2.1 Commitments

In order to minimise risks of harm, BP will:

- Take customer and household vulnerabilities, where known, into account when assessing the risk of harm of identified H&S hazards
- Take a fabric first approach to dealing with identified hazards, including damp[2] and mould[3].

In order to achieve legal compliance, BP will:

- Respond to all 'emergency'[4] H&S hazards within 24 hours and make safe where possible
- Respond and complete a 'relevant investigation'[5] for all 'significant'[6] H&S hazards within 10 working days
- Provide a written summary of the investigation findings within the 'relevant period'[7]
- Make safe any significant hazards within 5 days of the relevant investigation

- Begin any relevant supplementary remedial work as soon as reasonably practicable, and within 12 weeks of the conclusion of the relevant investigation
- Keep the tenant informed of the timing and progress of required work until the work is completed
- Provide temporary accommodation where the property cannot be made safe within statutory timescales
- Take legal action to gain entry where access to the property is denied or unreasonably delayed to address any emergency or significant H&S hazards.

3 Linked documents

- Health and Safety Policy
- Tenant Handbook
- Tenancy Agreements
- Estate Inspections Policy
- Corporate Strategy
- Disposals Policy
- Decant Policy
- Customer Feedback Policy
- Equity, Diversity and Inclusion Policy
- Empty Homes Policy
- Learning and Development Policy
- ASB Policy
- Other relevant BP policies and procedures

4 Legal and other requirements

4.1 Legal

This policy operates in the context of the following key legislation:

- Housing Act 2004
- Social Housing (Regulation) Act 2023
- The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (known as Awaab's law)
- The Housing Health and Safety Rating System (England) Regulations 2005 (HHSRS)
- Homes (Fitness for Human Habitation) Act 2018
- Landlord and Tenant Act 1985 (LTA)
- Health and Safety at Work etc. Act 1974 (HASWA)
- The Building Safety Act 2022 (BSA)
- The Building Regulations 2010 (BR)
- The Equality Act 2010

4.2 Other

This policy operates in the context of relevant best practice and sector standards and codes of practice and specifically:

- RSH Consumer Safety and Quality Standard
- Decent Homes standard
- HHSRS Guidance for Landlords
- Awaab's Law Guidance for Landlords
- Ombudsman Spotlight on Damp and Mould (D&M) Report

5 Scope and context

5.1 Persons

This policy applies to all relevant persons identified at section 6 and aims to protect customers, occupiers and visitors from *emergency* and *significant* hazards that may lead to a risk of harm within BP homes.

5.2 Premises

This policy applies to all BP owned and managed premises, specifically:

- Social rented domestic units – whether in multi-occupancy buildings or individual dwellings
- Supported housing schemes
- Communal spaces and land

It does not apply to low-cost home ownership premises, nor leasehold premises unless part of wider building safety issues.

5.3 Context

This policy sits within the context of the Corporate and supporting strategies to provide 'Safe, high quality homes' for BP customers.

6 Roles and responsibilities

6.1 Executive team

Accountable for:

- Overseeing implementation and compliance with all relevant legislation and BP policies relating to prescribed H&S hazards
- Ensuring adequate budget and resources are allocated to relevant preventative cyclical inspection, servicing, maintenance and replacement programmes
- Ensuring that, where repair timescales cannot be met, customers are offered temporary accommodation

6.2 Homes Director (Policy Owner)

Accountable for:

- Ensuring new build homes are designed and constructed to minimise potential H&S risks
- Ensuring property assets meet RSH Consumer Safety and Quality standards, Decent Homes and HHSRS requirements
- Ensuring component replacements are in line with specified timescales and relevant sector standards
- Ensuring a timely Response Repair service, in line with specified timescales for *emergency* and *significant* H&S hazards
- Ensuring lettable properties are free of any prescribed hazards
- Ensuring robust planned maintenance programmes for components with identified H&S hazards
- Ensuring a fabric first approach to tackling D&M issues in a timely manner
- Ensuring this policy and associated procedures are maintained in date and regularly reviewed
- Sponsoring audits of this policy and procedure to monitor the effectiveness within agreed timescales
- Ensuring adequate oversight and scrutiny of measured performance in line with policy commitments.

6.3 People Director

As Executive Lead for H&S Assurance is responsible for:

- Providing assurance to the Board and Executive that a robust H&S management framework is in place, is effective and meets all statutory and best practice requirements
- Maintaining oversight of the delivery of this policy and identified performance requirements.

6.4 Head of Safety Assurance

Accountable to the Policy Owner and responsible for:

- Keeping the Board and Executive appraised of any changes in legislative or sector best practice for prescribed hazards in housing
- Oversight of the implementation of this policy and its aims
- Ensuring all legal and other compliance requirements are met
- Providing adequate and competent advice and support to the business to assist them in meeting their roles and responsibilities
- Performance monitoring and assurance reporting on the requirements of this policy
- Supporting the internal and external audit process in relation to this policy
- Oversight of non-conformances to this policy and relevant legislation with analysis of causation and trends.

6.5 Head of Property & Compliance

Accountable for:

- Collating accurate stock component data to adequately inform and manage asset replacement and planned maintenance programmes in line with relevant legislative and other standards
- Identifying required resources necessary to implement a proactive planned asset replacement and maintenance programme
- Delivering a timely Response Repair service, in line with specified timescales for prescribed *emergency* and *significant* H&S hazards
- Ensuring delivery partners meet the required timescales and quality standards for required remedial work for prescribed *emergency* and *significant* H&S hazards
- Ensuring relevant KPIs are accurate and regularly reported in line with section 16.

6.6 Asset Manager

Responsible for:

- Minimising H&S hazards through managing assets and components in line with Decent Homes, through planned maintenance and replacement programmes
- Maintaining BP homes and communal spaces free of prescribed H&S hazards
- Managing planned remedial works in line with specified timescales for *emergency* and *significant* H&S hazards at section 2.1.

6.7 Property Compliance Manager

Responsible for:

- Minimising H&S hazards by managing cyclical inspection, servicing and maintenance programmes in line with legislative requirements
- Identification and reporting of prescribed hazards within communal spaces and BP homes
- Managing remedial works generated from cyclical inspection programmes in line with specified timescales for *emergency* and *significant* H&S hazards at section 2.1.

6.8 Responsive Maintenance Manager

Responsible for:

- Ensuring void properties are free of prescribed *emergency* and *significant* H&S hazards prior to letting
- Maintaining BP homes and communal spaces free of prescribed H&S hazards

- Delivering a timely response repair service and working with partners to ensure all prescribed *emergency* and *significant* H&S hazards are addressed in line with specified timescales for at section 2.1.

6.9 Damp and Mould team

Responsible for:

- Delivering a timely response to all reports of D&M in BP homes in line with specified timescales for *emergency* and *significant* H&S hazards at section 2.1.
- Logging, tracking and investigating D&M cases according to the risk rating system at Section 9.
- Planning, scoping and delivering required remedial works in line with specified timescales for *emergency* and *significant* H&S hazards at section 2.1.

6.10 Head of Housing

Accountable for:

- Maintaining communal cleaning and grounds maintenance contracts to a standard that minimises all *emergency* and *significant* H&S hazards
- Overseeing the Estate Inspection policy and programme to ensure routine risk based inspections are completed to minimise all H&S hazards
- Overseeing the ASB policy and preventative measures to maximise the safety and security of customers on their homes and to minimise any potential property damage which may lead to prescribed H&S hazards.

6.11 Lettings team

Responsible for:

- Ensuring customers are provided with relevant H&S information within their sign up packs to help prevent, minimise and report prescribed *emergency* and *significant* H&S hazards
- Assisting with the decant of customers and provision of temporary accommodation where relevant repair timescales cannot be met.

6.12 Governance & Risk Manager

Responsible for:

- Ensuring internal audit programmes are in place to monitor the effectiveness and compliance to this policy and procedure

6.13 Contractors

All Repairs, Voids, Planned Works and Servicing Contractors are, where relevant, responsible for:

- Completing remedial works in line with specified timescales for *emergency* and *significant* H&S hazards at section 2.1.

6.14 Managing agents

All managing agents, both general needs freeholders and management of supported tenants, are responsible for initiating repairs as defined within the relevant lease or management agreements, in line with specified timescales for *emergency* and *significant* H&S hazards at section 2.1.

6.15 Colleagues

Responsible for:

- Reporting to relevant management or the H&S team any situations or shortcomings which may constitute a H&S hazard, or a failure to meet Awaab's law, Decent Homes, or HHSRS standards
- Ensuring all H&S hazards, risks and repairs are dealt with strictly within the specified timescales for *emergency* and *significant* H&S hazards at section 2.1.

7 Training and competency requirements

7.1 General Awareness

All colleagues will receive awareness training on *prescribed H&S hazards* in housing, including:

- Triaging customer calls
- How to identify – 29 prescribed hazards
- How and where to report – which team
- How to assess – emergency or significant risk of harm
- How to action – timescales and process for repair

7.2 Competent persons

Teams that are responsible for instigating responsive or planned repairs will be provided with additional process and systems orientated training, including the importance of recordkeeping and logging of timescales.

7.3 Refresher Training

All training will be refreshed where deemed necessary, within 1 to 3 years depending on role and risk level.

7.4 Training Records

Records must be kept of all training and awareness delivered in line with this policy on the BP Learning Management System.

8 Information and communication

8.1 Customers

Customers will be kept informed of their responsibilities and requirements for maintaining safety within their property as part of their tenancy sign-up and our company communication channels. This includes allowing access to assess and take remedial action for required repairs. Refer to the Tenant Handbook and BP website:

- Emergency repairs
- Damp and mould

Where D&M is identified as a significant hazard, in addition to addressing the root cause, customers will be provided with relevant information on how to control and report future D&M problems.

A written summary of survey findings will be provided to the customer with 3 days of completion of the survey investigation to include as a minimum:

- whether or not the investigation identified a significant or emergency hazard
- what that hazard is
- what action is required and a target timescale for beginning and completing the work, or
- where there is no further action required, the reasons why
- information about how the customer may contact and challenge the findings.

Customers must be kept informed of progress against actions throughout the process until completion.

8.2 Colleagues

Colleagues can find all relevant information on D&M Hub on SharePoint and on the:

- The Damp and mould case tracker
- Damp and mould Power BI dashboard

9 Hazard and risk identification

All reported repairs, whether by customer, colleague or contractor, must be triaged by the receiver and assessed against the 29 prescribed hazards under HHSRS (see Appendix 1). They must then be categorised as either:

9.1 Emergency hazards – imminent risk of harm

Emergency hazard – where there is an *imminent and significant risk of harm* to the occupier's H&S that a reasonable landlord would take steps to **make safe within 24 hours,**

Examples of emergency hazards include:

- *Gas leaks*: Any suspected gas leak that poses an immediate danger.
- *Severe D&M*: Cases that are already having a "material impact" on a tenant's health, such as causing respiratory problems, are treated as emergencies.
- *Electrical hazards*: Any risk of electric shock, including exposed wiring.
- *Total loss of water supply*: The complete loss of water to the property.
- *Significant leaks or floods*: A major leak or internal flooding that creates an immediate hazard, including damage to electrical systems.
- *Broken doors or windows:* An unsecured property due to a broken door or window.
- *Broken boiler*: A malfunctioning boiler causing the loss of hot water or heating.
- *Significant structural defects*: Serious issues with a building's structure that present a risk of collapse.

9.2 Significant hazards – significant risk of harm

Significant hazard – where there is a *significant risk of harm* to the occupier's H&S that a reasonable landlord would take steps to **make safe as a matter of urgency (but not within 24 hours).**

Other serious, but less urgent, prescribed H&S hazards must be investigated within 10 working days. Refer to Appendix 1 for a list of the relevant 29 HHSRS prescribed hazards.

9.3 Categories of Damp and Mould

There are 3 categories of D&M cases as set out in the table below:

Category	Description	Action (refer to process map, App. 1)
Slight	• Condensation issue • Ventilation issues that can be rectified without extensive building works • Slight mould spotting • Light mould in the bathroom / kitchen (high moisture rooms)	• Repairs contractor to visit and assess, complete mould wash within 5 working days (make safe) • Improve and fit ventilation systems where relevant (within 20 working days) • Refer to D&M team if assessed as higher category
Moderate	• Damp or Mould in a bedroom • Any building intervention required	• Carry out mould wash within 5 days (make safe)

Category	Description	Action (refer to process map, App. 1)
	• Damp or mould as the result of a leak • Damp or Mould in more than one room	• Refer to D&M team for investigation within remaining 5 working days • Identify any additional vulnerabilities • Scope and plan required works • Conclude investigation and inform customer within 3 working days • Begin supplementary work within 12 weeks.
Severe	• Multiple rooms with damp or mould across the property • Resident needs to be decanted • Anything that will affect the resident health i.e. extensive black mould covering a large section of walls	• Carry out mould wash within 5 days (make safe), or decant if cannot be made safe • Refer to D&M team for investigation within remaining 5 working days • Identify any additional vulnerabilities • Scope and plan required works • Conclude investigation and inform customer within 3 working days • Begin supplementary work within 12 weeks.

9.4 Damp and Mould Risk factors

When assigning a category to a D&M case the following additional risk factors must be considered:

1. Vulnerable occupants - young children, elderly persons, disabled people and pregnancy
2. Pre-existing health conditions - asthma, allergies, COPD, or cardiovascular disease
3. Weakened immunity – those undergoing treatment for cancer or other long term health conditions
4. The extent of damp or mould – location, multiple rooms, type of mould

In order to determine the hazard level under the regulations, combine the category of damp and mould with the relevant vulnerability risk factors to obtain the hazard category. For guidance only:

- Moderate categorisation = ***Significant hazard***
- Moderate categorisation + risk factors (vulnerabilities) = ***Significant hazard***
- Severe categorisation = ***Significant hazard***
- Severe categorisation + risk factors (vulnerabilities) = ***Emergency hazard*** – decant may be required.

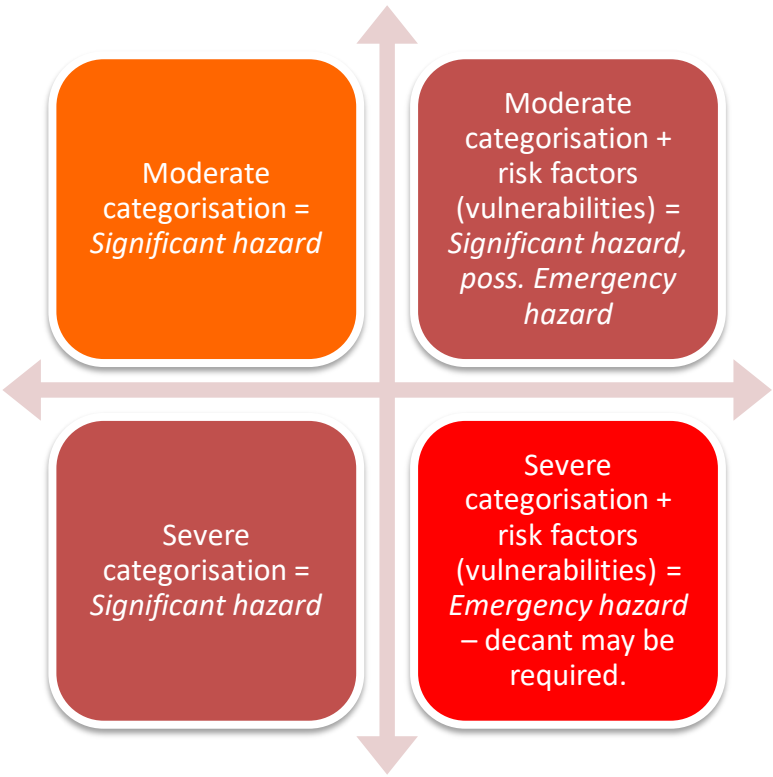


Figure 1. Category of damp + risk factors

An additional risk factor to be considered is where customers have chosen to cap their gas supply and use alternative sources of heating and hot water. This is likely to increase the likelihood of damp, mould and excess cold. This should always be discouraged and the Housing team must work with the customer to attempt to resolve any capped properties alongside any required remedial works.

9.5 Remedial works

Remedial works will be assessed on a priority basis by the competent surveyor and will be given a timescale for completion based on risk level.

Emergency hazard – where there is an *imminent and significant risk of harm* to the occupier's H&S that a reasonable landlord would take steps to **make safe within 24 hours.**

Significant hazard – where there is a *significant risk of harm* to the occupier's H&S that a reasonable landlord would take steps to **make safe as a matter of urgency (but not within 24 hours).**

Significant hazards must be made safe and begin or take steps to begin work to prevent the hazard recurring within 5 working days of investigation concluding. Further remedial work must be started as soon as reasonably practicable and within 12 weeks.

Where *make safe* or remedial works cannot be started within the above timescales then the customer must be provided with temporary accommodation.

10 Procedure (operational risk controls)

10.1 MHCLG process flow

Summary of MHCLG guidance for timescales for investigations, written summary, make safe and commencement of further works.

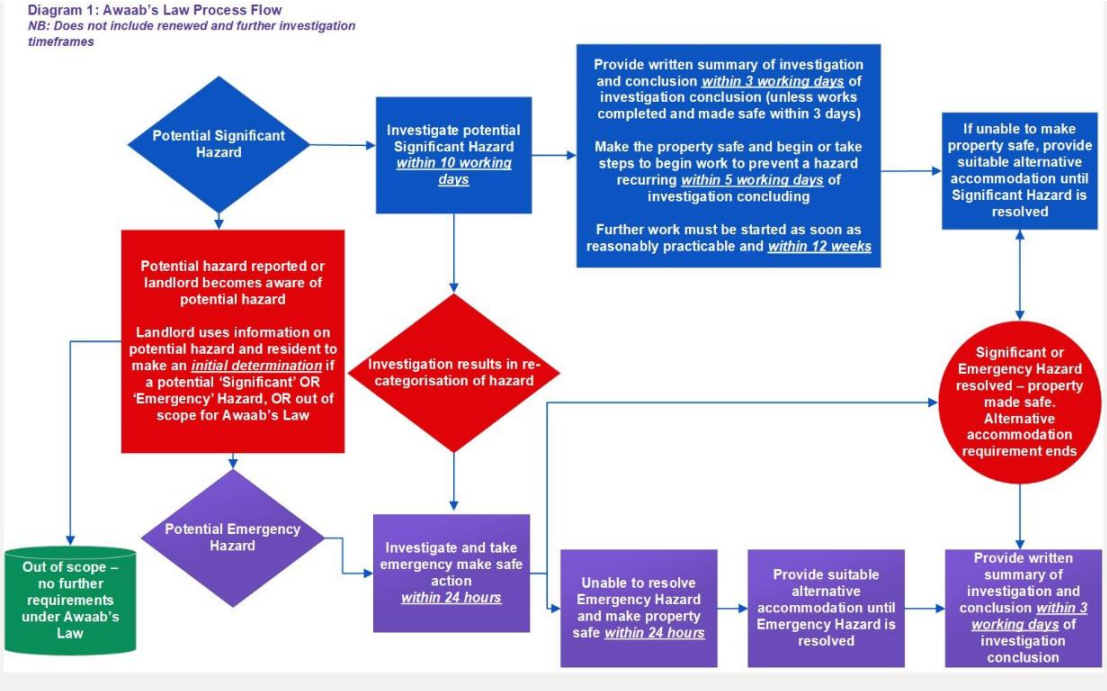


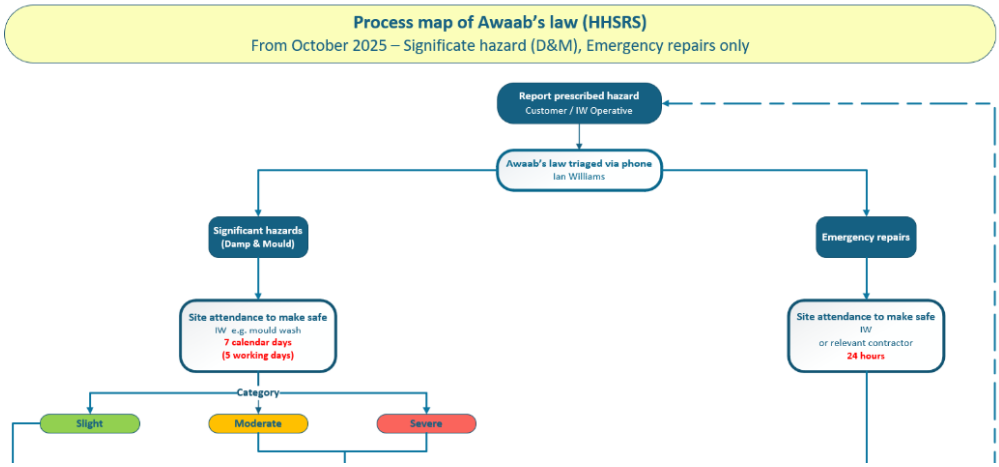
Figure 2. Awaab's Law Process Flow (MHCLG)[a]

10.2 BP process flow

BP colleagues must follow the BP process flow for Awaab's law response to reported prescribed hazards, currently includes all Emergency hazards and D&M significant hazards.

[a] Awaab's law guidance for social landlords on timescales for repairs

10.3 Triage (IW)



Customer, colleague or contractor reports repair requirement.

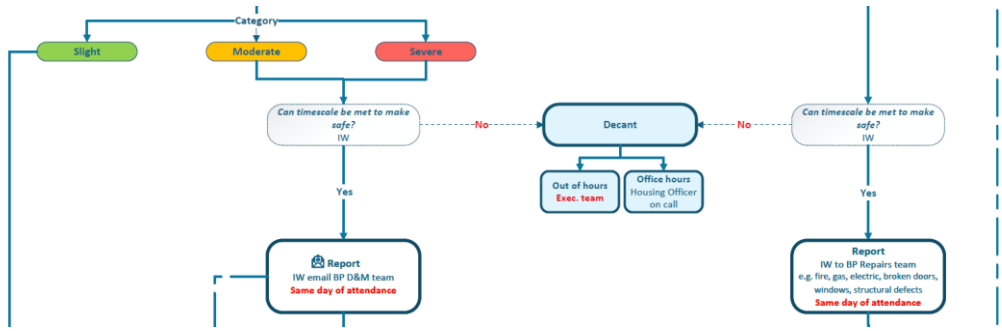
IW or other relevant contractor triages repair against 29 prescribed H&S hazards & any known customer vulnerability.

IW or other relevant contractor categorises **emergency** repair to be made safe within 24 hours.

IW or other relevant contractor categorises **significant** hazard e.g. D&M.

IW categorises level of D&M.

10.4 Make safe



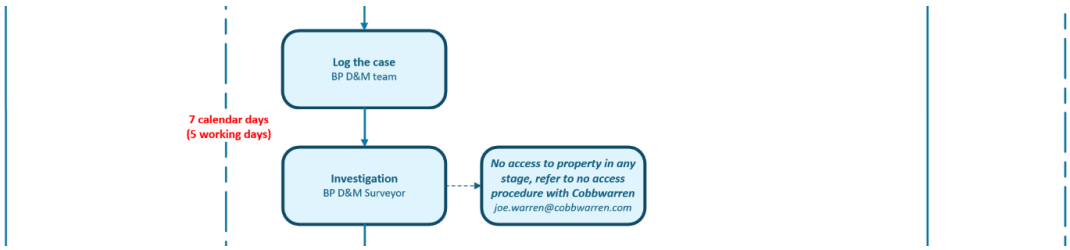
Make safe work to be completed within 5 working days.

IW to confirm to BP if timescale can be met.

Refer to Lettings or Exec (OOH) for decant if needed.

IW to report emergency repairs to BP Repairs team on the same day of attendance if further works are required.

10.5 Log and investigate

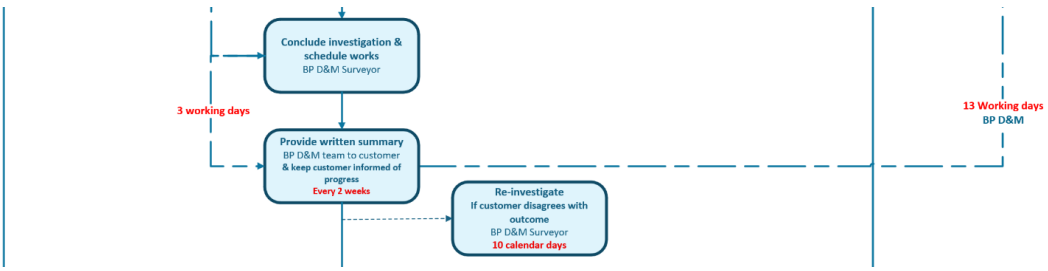


BP D&M team to log the case on SharePoint D&M list and assign a surveyor to attend and complete investigation within 5 working days.

D&M surveys will be completed within Fieldview.

In case of no access in any stage of the process please refer to no access procedure with Cobbwarren.

10.6 Conclude and provide written summary



BP D&M surveyor to schedule works and provide written summary of investigation findings to customer within 3 working days. *(The written summary must be issued within 13 days from day 0 of the hazard being reported unless the property is made safe and works are completed within 3 working days).*

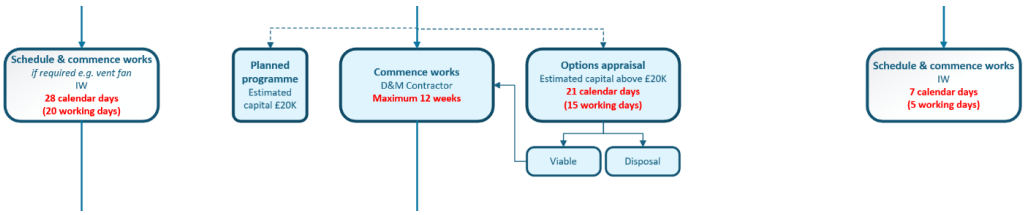
Written summary communications will be generated from the data collated on the survey reports in Fieldview.

Where the remedial work is completed within the relevant time period and no further works are required there is no requirement to provide a written summary.

BP D&M surveyor to update customer on work progress every 2 weeks.

If the customer disagrees with the outcome, the BP D&M Surveyor will re-investigate, and the 10 working days will restart.

10.7 Schedule works



IW to carry out supplementary preventative works for emergency repairs within 5 working days.

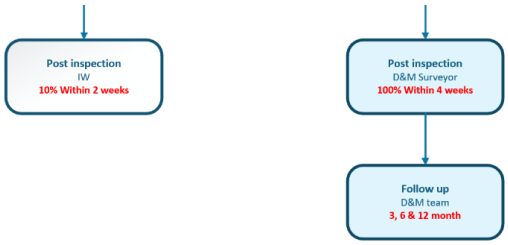
BP D&M contractor to commence works within a maximum of 12 weeks.

An option appraisal will be carried out within15 working days if the estimated capital cost exceeds £20K.

If the estimated cost is below £20K, the property may be added to the planned programme.

Slight cases of D&M, following mould wash, may require standard follow on works e.g. installation repair or replacement of ventilation systems, within 20 working days.

10.8 Post works



IW to carry out post inspection on 10% of slight cases within 2 weeks.

BP D&M surveyor to carry out post inspection to all D&M cases within 4 weeks of contractor completing the works.

BP D&M team to follow up on cases at 3, 6 &12 month.

11 Change management

Any changes relevant to this policy, including new legislation or sector best practices, must be assessed for health and safety impacts and documented accordingly. Changes affecting policy objectives must be agreed by the Executive.

The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (known as Awaab's law), has transitional arrangements with the gradual introduction of additional prescribed hazards.

In **2026**, the regulations extend to include the following hazards where they present a significant risk of harm:

- excess cold and excess heat
- falls associated with baths etc., on level surfaces, on stairs and between levels
- structural collapse, and explosions
- fire, and electrical hazards
- domestic and personal hygiene and food safety

In **2027**, the regulations extend to all remaining HHSRS hazards (apart from overcrowding) where they present a significant risk of harm. The phased approach does not mean that social landlords have leeway on addressing dangerous issues in their homes in the meantime. BP will need to continue to meet their legal duties to keep homes safe by fixing disrepair, and keeping their homes fit for human habitation and free of dangerous 'category 1' health or safety hazards. BP will continue to meet the outcomes set out by the Regulator of Social Housing in its Safety and Quality standard.

This policy and procedure will be reviewed annually until the transitional period ends.

12 Procurement and contractor management

BP will ensure contracts and service level agreements are in place with all relevant contractors responsible for maintaining our stock free of prescribed *emergency* and *significant* hazards. Contractors will be subject to a robust assessment process to ensure they can meet the strict timescales and requirements set by this legislation.

13 Emergency preparedness and response

All *emergency* hazards, where there is an imminent and significant risk of harm, must be dealt with and made safe in accordance with the 24 hour requirement. Refer to section 9.1 for examples.

There are certain emergencies that BP cannot respond to. Where they fall outside of the remit of BP, customers must be referred to the appropriate authorities (list not exhaustive):

- *Gas leaks*: for gas supply issues call the National Gas Emergency Service immediately on 0800 111 999.
- *Electrical outage or downed power lines*: call 105 or local network supplier
- *Total loss of water supply*: call local supplier (refer to household bill) or the Gov Water Supplier interactive map
- *Significant leaks or floods*: call the local council or Environment Agency hotline. Refer to Government guidance for reporting floods
- *Broken doors or windows:* criminal damage or break-ins must be reported to the Police by calling 101 or report online, and an incident number obtained

- *Fires or arson attempts*: call 999 or 112 and request the Fire and Rescue service immediately
- *Structural issues*: where the stability of a property has been significantly affected by a fire, explosion, vehicle impact, severe weather event, falling tree or similar, call the emergency services on 999 or 112 in the first instance. Structural engineer to be mobilised as soon as possible to assess and report on required works.

Emergency situations that do fall within BPs remit, as a landlord, and that require an immediate responses within 24 hours include (but not limited to):

- *Gas appliances*: faulty gas appliances, pipework or flues. Gas cookers are generally customers own responsibility, unless provided by BP.
- *Electrical hazards or shocks:* faulty or damaged electrical installations
- *Loss of hot or cold water supply*: where the cause is not related to public supply
- *Significant leaks or floods*: burst water pipes, overflowing sewage or drains
- *Broken doors or windows:* where the property becomes insecure or poses a safety risk to children or vulnerable adults
- *Broken heating systems*: loss of hot water or heating
- *Fires or arson attempts*: resulting damage to property
- *Fire safety systems*: faulty or damaged fire alarms or fire control systems
- *Asbestos*: damage to Asbestos Containing Materials (ACMs)
- *Lifts*: faulty passenger or stairlifts, where landlord defined responsibility not disabled facilities grants (DFGs).

14 Incident reporting and investigation

14.1 Incident reporting

All emergency and significant H&S hazards that cause actual or potential harm or loss, including dangerous occurrences, must be reported on the BP incident reporting system found on the H&S SharePoint.

14.2 Investigation

All incidents will be investigated thoroughly. Findings and lessons learned will be reported to the Executive and/or relevant committees.

14.3 Incident analysis

Incidents will be analysed to establish trends and opportunities for improvement in systems and procedures.

14.4 RIDDOR

Significant incidents resulting in harm or injury to colleagues or customers may be reportable to the HSE under RIDDOR.

14.5 Insurance claims

If personal injury results from an emergency or significant hazard, the customer may wish to initiate a claim. Please refer to the Insurance claim process map, providing all relevant information and evidence to the H&S team.

Awaab's law gives clear timelines for landlord response to hazards. Failure to adhere to these timelines provides a sound basis for customers to initiate a Disrepair claim. Please refer to @Cobwarren for all disrepair claims.

15 Data, documents and records management

Documents and records must be retained for legal purposes and to evidence compliance with all stages of Awaab's law. All records relating to emergency and significant hazards will be retained in the following systems with fully auditable history.

- Repairs data – OH, SharePoint
- Compliance servicing data – OH, SharePoint
- D&M survey data – Fieldview, SharePoint
- D&M cases – D&M tracker
- Written summaries – OH, SharePoint
- Incident data – H&S SharePoint
- Training data – Eloomi
- Decant data - SharePoint

16 Measurement of success

16.1 Performance Monitoring

Performance monitoring will be conducted through various oversight committees, including monthly performance meetings and audits. Customer oversight will be undertaken via the Resident Engagement Panel.

Key performance indicators (KPIs), strategic and operational, will be reported to the Performance Group, Exec, CEC and Board and reviewed regularly, these will include:

- Emergency hazards made safe within timescale
- D&M cases (significant hazards) surveyed within timescale
- Providing written summary to customer within timescale
- Remedial works commenced within timescale
- Remedial works completed within timescale

17 Internal and external audit

This policy may be subject to internal audit processes as part of planned and ongoing landlord compliance checks. It may also form part of the HSMS periodic audit and review process.

18 Improvements

18.1 Non-conformity reports

Non-compliance issues will be reported and addressed with appropriate corrective actions.

18.2 Corrective action tracking

Non-conformities must be addressed with timely corrective actions. All safety-related non-conformities will be treated as high priority.

19 Delivery and management review

19.1 Delivery

All aspects of this policy will be implemented through the established HSMS procedures. Responsible persons at section 6 are required to fulfil their roles accordingly and raise any shortcomings in their ability to meet expected standards. Reporting and assurance will be provided to the Board.

19.2 Management review

The policy will be reviewed at least annually until the transitional period ends, to ensure its effectiveness and compliance. This will have Executive oversight through the quarterly H&S Steering Group and 6 monthly reports to Board.

20 Data protection

Any personal data created or used in the application of this Policy must be done so in line with the BP Data Protection policy and employee privacy notice.

21 Equity, diversity and inclusion

This policy and procedure support BP's commitment to equity, diversity, inclusion and safety of all customers, colleagues, contractors, and members of the public. It applies to the health, safety, wellbeing, and protection of all and support will be provided to any identified vulnerable persons.

Where required, reasonable adjustments will be considered to support colleagues to engage with this Policy. Please speak to Human Resources for assistance.

22 Appendix 1 – Definitions Prescribed hazards (HHSRS)

The following is an abbreviated guide of prescribed hazards and required standards from the HHSRS Landlord Guidance. For the full version please refer to Government website.

22.1 A Physiological requirements

22.1.1 Damp and mould growth

Includes threats to physical and mental health from mould or fungal growth. Both are caused by dampness and/or high humidity.

Preventive measures relating to moisture production and ventilation:

- damp proof courses, membranes and detailing around doors and window openings
- external fabric kept in good repair to avoid rain penetration
- frost protection for pipes and tanks
- properly installed baths, sinks etc., with
    - properly installed drainage
    - properly installed and maintained rainwater goods
    - properly ventilated roof and under floor spaces to ensure timber remains air dry
    - adequate extraction of moisture laden air during peak times, like cooking and bathing and laundry
    - continuous low-level background ventilation where necessary
    - sufficient means of ventilation to cope with moisture from normal domestic activities without the need to open windows that could lead to heat loss, noise and security risks
    - appropriate ventilation for dwellings of high occupant density

22.1.2 Excess cold

This covers the threats to health when temperatures fall below the minimum satisfactory levels for relatively long periods.

Preventive measures:

- appropriate levels of thermal insulation to minimise heat loss. Level depends on location/exposure/relationship to other dwellings/buildings orientation
- appropriate heating system safely and properly installed and maintained and controllable by occupant
- appropriate/properly installed/maintained occupant controllable low-level background ventilation without too much heat loss/draughts
- means for rapid ventilation at times of high moisture production in kitchens/bathrooms through fans
- properly sited/sized permanent openings (e.g. air bricks/open-able windows)
- properly fitting butt-jointed floor boarding/doors/windows

22.1.3 Excess heat

This category includes threats from excessively high indoor air temperatures.

Helpful preventive measures that could have an effect on likelihood and harm outcomes:

- large areas of south facing glazing could have shuttering or blinds to control heat in summer months
- means of cooling during hot summer weather, either by natural ventilation or air conditioning
- controllable heating systems

22.1.4 Asbestos and MMF

Includes the presence of and exposure to asbestos fibres and Manufactured Mineral Fibres (MMF, which include rockwool and glass fibre blankets) in dwellings. (White, blue and brown forms of asbestos fibres are included, that is chrysotile and both forms of amphibole.)

Asbestos:

- damaged or likely to be damaged or disturbed asbestos should be assessed for repair, sealing, enclosure or removal by licensed (HSE) contractors
- existing asbestos can be managed in situ (covered or protected and the condition monitored) if it is in good condition and unlikely to be damaged/worked on/disturbed
- keeping a record of asbestos location in the building

- protecting it from damage by occupants

MMF:

- minimal possible exposure to fibres during maintenance/installation/removal

22.1.5 Biocides

These are chemicals used to treat timber and/or mould growth in dwellings. (They are also used to kill pest infestations, such as insects and rodents, however, these biocides are not considered for the purposes of the HHSRS.

22.1.6 Carbon monoxide and fuel combustion products

These are all linked to the (partial) combustion of gas, oil, solid fuels for heating and cooking in dwellings.

Preventative measures relating to carbon dioxide, nitrogen dioxide, sulphur dioxide:

- proper installation and maintenance of gas/oil/solid fuel burning appliances
- adequate air supply for such appliances
- proper siting and connection with adequately sized flues
- adequate ventilation in rooms with such appliances
- regular maintenance of flues
- gas heating appliances to be fitted with flues for correctly balanced flow of air inside and out
- ventilated lobby between integral garage and living accommodation
- properly sited and maintained carbon monoxide detectors

22.1.7 Lead

There are two main sources around dwellings – paint and water pipes. Other sources of lead might include soil, especially around older buildings with flaking external paintwork and areas around industrial premises using (or having previously used) lead. There may also be lead traces in soil close to busy roads because of the exhaust fumes from leaded petrol.

22.1.8 Radiation

The main source of harmful radiation in dwellings is from radon gas. Radon is colourless and odourless, and it is not possible to detect it, either in the air or the water, without testing and measurement. Radon can be dissolved in

water, particularly in private water supplies, but it is airborne radon that poses a more significant threat.

22.1.9 Un-combusted fuel gas

This hazard includes the threat of asphyxiation resulting from the escape of fuel gas into the atmosphere of a dwelling.

It does NOT include hazards linked with poisoning associated with incomplete combustion of gas back into a dwelling, nor explosions resulting from un-combusted fuel gas.

22.1.10 Volatile organic compounds (VOCS)

Are a range of organic chemicals that are gaseous at room temperature and found in a wide variety of materials in the home.

Formaldehyde is included in this hazard. People in newly built/refurbished dwellings are most likely to be exposed to VOCs.

22.2 B Psychological requirements

22.2.1 Crowding and space (excluded from Awaab's law)

Includes all the hazards associated with lack of space and crowding. It takes into account the psychological needs for both social interaction/privacy. It also looks at the effects of crowding on space requirements for household activity.

22.2.2 Entry by intruders

This hazard is concerned with keeping a dwelling secure against unauthorised entry and maintaining its safety.

Preventive measures relating to home security:

- design of estate/area around dwelling to reduce hiding places, as far as possible (e.g. fences etc.) for burglars and intruders
- well-lit and defined pedestrian routes
- dwelling made safe against unauthorised entry so as to delay and deter intruders and make the occupants feel safer
- window locks/dead locks
- security lights/indoor grilles
- spy holes/chains on entrance doors

22.2.3 Lighting

Includes threats to physical and mental health associated with inadequate natural/artificial light.

It also includes the psychological effect linked with the view through glazing from the dwelling.

22.2.4 Noise

This includes threats to physical and mental health from exposure to noise in the home caused by a lack of sufficient sound insulation. It does not cover unreasonable noisy behaviour of neighbours (domestic or commercial). Please refer to ASB policy.

Preventive measures that can minimise noise levels:

- double/secondary glazing and lobbies to external doors where there are high outside noise levels (e.g. traffic)
- possible triple glazing near airports/sources of very high noise levels
- insulation of upper floor/ceiling/roof space where aircraft noise is likely
- plumbing from WCs/cisterns sited away from separating walls
- bathrooms/WCs in flats not sited above living rooms/bedrooms
- better construction/conversions of partitions and party walls especially in flats/maisonettes
- sound insulation between one dwelling and another.

22.3 C Protection against infection

22.3.1 Domestic hygiene, pests and refuse

This is concerned with protection against infection. Includes hazards resulting from:

- poor design/layout/construction of the dwelling so that it is difficult to be kept clean and hygienic
- access into and harbourage within the dwelling for pests
- inadequate and unhygienic provision for storage and disposal of household waste

Note: hazards connected with sanitation and drainage, domestic water, personal washing facilities and food safety are considered in other profiles.

Preventative measures to reduce harm outcomes

- design/construction/subsequent maintenance of building should help it to be kept clean preventing build-up of dirt and dust
- personal washing/sanitation/food preparation/cooking/storage areas should be capable of being maintained in a hygienic condition

- reduction of the means of access by pests into buildings to a minimum
- all internal surfaces easily cleaned/pest resistant material to be used where possible
- dwelling exterior free of cracks and unprotected holes, otherwise grilles/other methods to be used for protection
- service ducting/roof/floor spaces to be effectively sealed but with suitable access if treatment is needed
- drain openings, WC basins to be sealed with an effective water tight seal
- drainage inlets for waste and surface water to be sealed
- any points in walls penetrated by waste, drain or other pipes or cables to be effectively sealed
- holes through roof coverings, eaves and verges to be blocked to deny ingress to rats/mice/squirrels/birds. Necessary holes to be covered by grilles
- adequate and closed storage for refuse awaiting collection or disposal outside dwelling
- suitable storage for refuse within the dwelling
- storage to be accessible to occupants but not be a danger to children
- refuse facilities should not cause hygiene problems

22.3.2 Food safety

Includes threats of infection resulting from inadequacies in provision and facilities for storage/preparation/cooking of food.

Preventative measures to reduce harm outcomes

Generally kitchen facilities should be in a properly designed room or area to cater for safe and hygienic preparation and cooking of food.

Storage

- suitable storage for food to slow down deterioration and decomposition
- facilities should be of adequate size for the number of occupants for hygienic storage of fresh foods
- should be facility for food cupboard/larder and refrigerator and freezer with appropriate sockets

- such facilities should have smooth impervious surfaces for easy cleaning and maintaining in hygienic condition
- separate shelves for different foods
- facilities should be cool and dry and protected from direct sunlight

Preparation areas

- should be adequate sized sink/dual sink free from cracks/chips/other damage plus drainer
- hot and cold water
- suitable drainage for waste water
- suitably sized work tops, securely fixed; smooth impervious surface, easily cleanable
- at least 4 appropriate power sockets associated with the worktop(s) as well as 2 for general use

Cooking

- facilities should be of adequate size for the household with appropriate connections for fuel (gas or electricity)
- should be capable of being readily cleansed and maintained in hygienic condition

Design, layout and state of repair

- kitchen floor should be reasonably smooth and impervious for easy cleaning and maintaining in a hygienic condition
- corners and junctions should be sealed and covered to avoid uncleanable junctions
- wall surfaces should be smooth, or with impervious finish and easily cleaned, especially those adjacent to cookers/sinks/drainers and worktops
- joints between sink/drainer/worktop and adjacent wall should be sealed and water tight
- layout/relationship of facilities should ease the stages of preparation, cooking and serving
- adequate and appropriate lighting especially over the facilities
- suitable ventilation of whole of kitchen area, especially the cooking area

22.3.3 Personal hygiene, sanitation and drainage

Includes threats of infection/threats to mental health associated with the above, including personal washing and clothes washing facilities.

Preventative measures to reduce harm outcomes

Personal hygiene

- sufficient numbers of properly connected/fitted baths/showers for (potential) occupants
- bathroom/shower room to have privacy/heating/lighting/ventilation
- sufficient number of suitably connected and sited wash hand basins for occupants
- suitably connected, easily cleaned sinks with proper waste drainage for each dwelling/household
- appropriate facilities for washing machine/clothes drying/adjacent power sockets/vent outlets

Sanitation - provision of

- properly installed/securely fixed/easily cleansed WC basin with hinged lid/seat of impervious material
- connected to a properly working flushing system
- connected to proper/adequate drainage system
- number of sanitary closets to be related to number of levels in dwelling and the number of persons (irrespective of age)
- sanitary compartments separate from bathrooms
- compartments/bathrooms to be ventilated to external air
- lockable doors from inside to compartments/bathrooms but openable in emergency

Drainage

- wastewater to be discharged into properly designed trapped drainage inlets/vertical drains connected to the main sewerage system
- properly designed soakaways for private treatment or storage system for foul sewage
- systems to be ventilated to prevent siphonage of traps and facilities connected to sewer

- surface water to be discharged into properly designed trapped drainage inlets connected to main drainage system

22.3.4 Water supply

This is limited to the supply after delivery to the dwelling and concerned with water for drinking/cooking/washing/cleaning/sanitation.

Preventative measures to reduce harm outcomes

- water pipework and storage facilities provided and maintained according to requirements of BS 6700
- plumbing systems to meet requirements of Water Supply Regulations 1999
- stored private drinking water supplies regularly sampled and analysed
- tanks covered to prevent ingress of contamination (i.e. birds/insects etc.)
- appropriate materials used for pipework/storage tanks/fittings
- proper maintenance of water filters and softening systems

22.4 D Protection against accidents

22.4.1 Falls associated with baths etc

Includes any fall associated with bath/shower/similar facility, whether that fall is on the same level or from one level to another.

22.4.2 Falling on level surfaces etc

Includes falls on any level surface such as floors/yards/paths.

Also trip steps/thresholds/ramps where the change in level is less than 300mm.

22.4.3 Falling on stairs etc

Covers any fall associated with a change in level greater than 300mm and includes falls associated with:

- internal stairs or ramps within the dwelling
- external steps or ramps within the immediate area of the dwelling
- internal common stairs or ramps within the building containing the dwelling unit and giving access to the dwelling or shared facilities

- external steps or ramps within the immediate area of the building which contains the dwelling unit and giving access to that dwelling or shared facilities

Does not include trip steps/thresholds/ramps where the change in level is less than 300mm. These are assessed under falls on the level.

Preventative measures to reduce harm outcomes

- tread dimensions to be between 280mm and 360mm
- rise dimensions to be between 100mm - 180mm
- pitch (angle of stairs) to be less than 42˚
- stairs should be checked for above average steepness or shallowness
- consistency/uniformity in dimensions of rise and going within a flight (except for obvious change in direction of stair e.g. use of winders)
- nosing should not project more than 18mm beyond any riser
- treads and nosings should provide appropriate friction (carpet etc, if possible)
- provision of carpet/rug etc., at foot of stairs to help cushion possible impact
- openings in stairs or banisters should be less than 100mm
- avoidance of alternating treads, particularly those not conforming to current Building Regulations
- handrails/banisters must be provided either side of the staircase
- handrails to be sited between 900mm and 1000mm measured from the top of the handrail to the pitch line or floor/easy to grasp/extend the full length of the flight
- should be designed to prevent climbing
- stair width should be a minimum of 900mm-1000mm
- provision of adequate landing/floor space leading to the stairs (top and bottom) so user can check start/dimensions of stairs and steps
- adequate natural lighting to the top and foot of the flight
- adequate artificial light to the top and foot of the flight
- adequate and convenient means of controlling the artificial lighting
- no glare from natural/artificial lighting

- avoid doors which open directly onto stairs or the head of the stairs causing obstruction or increasing the likelihood of a fall
- avoidance of projections and sharp edges on stairs and glass or radiators at the foot of the stairs
- all elements of stairs should be kept in good repair
- dwelling should be adequately heated and insulated to avoid impairment of movement and sensation

22.4.4 Falling between levels

Includes falls between two levels within and outside a dwelling or building where the change in level is more than 300mm. Includes falls from/out of dwellings, e.g. windows/balconies/accessible roofs/over landing balustrades.

Also includes falls from any other change in level not served by stairs/steps (e.g. over the guard rails to galleried rooms/basement wells or to garden retaining walls).

Does NOT include falls from stairs/steps/ramps/chairs/tables/ladders.

22.4.5 Electrical hazards

Include hazards from shock and burns resulting from exposure to electricity but not risks associated with fire caused by deficiencies to the electrical installations, e.g. ignition caused by a short circuit.

Preventative measures to reduce harm outcomes

- electrical wiring installation meets the latest requirements of Institution of Electrical Engineers/British Standard (BS 7671) (Often available in local reference libraries)
- adequate number of appropriately sited electrical socket outlets
- appropriately sited fuses and meters
- adequately earthed electrical system
- installation, i.e. supply/meters/fuses/wiring/sockets/light fittings/switches to be maintained in good repair
- electrical installations to avoid close proximity to water including areas of damp
- lightning Protection System to be kept in good repair

22.4.6 Fire

Includes threats from accidental (as opposed to arson) uncontrolled fire/associated smoke.

Preventive measures to reduce harm outcomes:

- safe siting for cookers, away from flammable materials
- properly designed/installed/serviced/maintained space heating
- sufficient/appropriately sited electric socket outlets
- properly installed/maintained/regularly checked and tested distribution board and wiring
- residual Current Devices
- fire and smoke permeable resistant materials in design of the building where possible
- fire stops to cavities including ventilation and heating systems
- design and construction of the building to limit the spread of fire/smoke
- properly constructed/fitted internal doors with self closers where appropriate
- furniture to comply with current regulations (currently the Furniture and Furnishings (Fire) (Safety) Regulations 1988 as amended) in furnished accommodation
- detectors/smoke alarms properly designed/sited/maintained/regularly tested
- appropriately sited extinguishers and fire blankets (especially kitchen)
- means of escape from all parts of dwelling/building, e.g. openable door window/protected staircase etc./depending on height of building
- effectiveness/presence of detection/alarm systems/primary fire fighting equipment such as sprinkler systems

22.4.7 Flames, hot surfaces etc

This is concerned with injuries from:

i) Burns which are caused by contact with a hot flame or fire or hot objects or hot non-water based liquids;

ii) Scalds which are caused by contact with water-based liquids and vapours.

It also includes burns and scalds from spills during cooking or preparing hot drinks. It does not include burns from an uncontrolled fire at the dwelling.

Preventive measures to reduce harm outcomes:

- design and layout of the kitchen, including location of the cooker, the design and controls of heating appliances
- fires and heaters - there should be protection from any open flame to prevent clothing catching alight
- surfaces should be covered if the temperature is more than 70˚C
- ideally, hot water should be no more than 60˚C in kitchens, 41˚C for hand basins and 46˚C for baths

22.4.8 Collision and entrapment

Includes threats of trapping body parts (e.g. fingers/limbs) in architectural features (e.g. doors/windows). Also includes striking (colliding with) features such as glazing/windows/doors/low ceilings/walls.

22.4.9 Explosions

Includes threats from debris created by the blast/partial or total collapse of the building as a result of the explosion. Possible scalding if a hot water appliance is involved e.g. unvented cylinders.

22.4.10 Position and operability of amenities etc

Includes threats of physical strain associated with functional space and other features at the dwelling. It also includes physical strain which may result from avoidance of other hazards (see Collision and Entrapment and Falls hazards).

Appropriate positioning of amenities/fittings/equipment and the layout of dwellings can have a significant effect preventing strain/sprain fall injuries.

22.4.11 Structural collapse and falling elements

Includes threats of whole dwelling collapse and/or an element or a part of the fabric being displaced or failing because of inadequate fixing/disrepair or adverse weather conditions. Structural failure can be internal, threatening the occupants or within the immediate external area putting members of the public at risk e.g. garden walls.

23 Definitions

[1] Prescribed hazards – as defined by the Housing Health and Safety Rating System (HHSRS) Regulations – 29 health and safety hazards

[2] Damp – dampness is the presence and build up of unwanted moisture in the structure of a building, either the result of intrusion from outside or condensation from within the structure.

[3] Mould – mould is a natural organic compound that develops in damp conditions and will only grow on damp surfaces. It often appears as black, white, or green patches on walls and other surfaces and is caused by issues like leaks or condensation, and if left untreated, can be detrimental to health.

[4] Emergency hazard - means, in relation to a social home, a relevant hazard that poses an imminent and significant risk of harm to the health or safety of an occupier of the social home

[5] Relevant investigation – means a standard, renewed or further investigation within the required periods

[6] Significant hazard - means, in relation to a social home, a relevant hazard that poses a significant risk of harm to the health or safety of an occupier of the social home

[7] Relevant period – means the period of 3 working days beginning on the day after the day on which the relevant investigation is completed