

Lifting Equipment Safety Policy

At the time of Policy approval Flagship Housing Group manages in the region of 30,318 tenanted properties. Passenger Lifts within Non-Domestic properties and other Lifts and Lifting Equipment within Flat Blocks and in individual dwellings need to be inspected and kept safe for use and must be regularly maintained.

Department	<i>Asset Management</i>
Policy Owner	<i>Head of Landlord Compliance</i>
Approved Date	<i>25th July 2023</i>
Date for Review	<i>July 2024</i>
Approving Body	<i>Asset Management Committee</i>
Associated Legislation/Regulation	LOLER (Lifting Operation and Lifting Equipment Regulations) 1998 PUWER (Provision and Use of Work Equipment Regulations) 1998
Equality Impact Assessment Date	<i>04/07/2023</i>
Version Number	<i>1.0</i>

Purpose / Principles

This Policy explains how Flagship Housing Group's commitments to Lift Safety will be met. It will be supported by a Lift Safety Management Plan providing more detailed guidance and procedures.

Roles / Responsibilities

Role	Responsibilities	Frequency
Flagship Housing Group Board	<ul style="list-style-type: none"> • They are the Responsible legal entity and oversee the discharge of the required standards. • Act as Duty Holders and are accountable for ensuring the implementation of this Management Plan and the associated Policy. • Receive assurance through regular performance reports that the Management Plan and Policy are being implemented and that the regulations are being fully complied with. • Ensure the safety of staff, tenants, Contractors and the wider general public has not been compromised. • Ensure that appropriate governance arrangements are in place to keep internal stakeholders, and other interested Third Parties, informed of the regulatory landlord compliance position. • Responsible for ensuring that any necessary remedial action, arising from performance reports, is undertaken to comply with the Policy and ensure that a regulatory Landlord Compliance position is maintained. • Receive Quarterly KPI reports and commentary on Lift Safety compliance performance. 	Ongoing
Asset Management Committee	<ul style="list-style-type: none"> • Receive Internal Audit reports and monitor the delivery of managers' actions arising, through to successful completion. • Draw any concerns they may have arising from such reports to the attention of the Board. 	Quarterly

The Chief Executive Officer	<ul style="list-style-type: none"> Retains overall responsibility for the monitoring of the consistent implementation of this Management Plan and Policy. Effectively comply with the regulatory standards through the implementation of the Management Plan and Policy to. If the regulatory standards are not maintained, to report any breach in standards to the Regulator of Social Housing. 	Ongoing
Director of Strategic Asset Management	<ul style="list-style-type: none"> Agree and set budgets that are sufficient to meet the compliance requirements related to Lifts Safety. Appoint/ nominate sufficient resources to fulfil the Responsible Person roles for all Lift Safety requirements and use this Management Plan to define their duties. Delegate appropriate authority for in-house delivery or procurement to meet the requirements. Seek assurance that the Regulations are being adhered to and regularly review Internal Service Provider and/or external Contractor operational practices and performance. Ensure that the conditions of all Contracts are being fulfilled either by Internal Service Provider/s or external Contractors. Manage the availability of accurate Stock Data and Landlord Compliance Data sub-sets against which to prepare Work Programmes and Contracts. 	Ongoing
Director Legal and Governance	<ul style="list-style-type: none"> Seek assurance that the regulations are being adhered to and regularly review Internal Service Provider and/or external Contractor operational practices and performance. 	
Director Health and Safety	<ul style="list-style-type: none"> Deliver an internal assurance testing framework to provide assurance on operational procedures Provide critical friend support and advice 	
Head of Landlord Compliance	<ul style="list-style-type: none"> Manage the strategic implementation of this Management Plan and Policy and ensure compliance with all Regulations. Chair the Asset Compliance Group meetings and ensure that agendas and discussion are aligned to the risk and that areas of non-performance are recorded, reported and escalated where required. Ensure the operational delivery of this Management Plan and Policy and compliance with the regulations. 	Ongoing

	<ul style="list-style-type: none"> • Produce, Review and update the Policy and Management Plan at the appropriate review dates. • Will formulate programmes of work consistent with the delivery of this management plan and policy. • Receive Audit feedback and act upon the findings. • Report all material issues of non-compliance (whether potential or actual) to the COO irrespective of whether this relates to a KPI scrutinised by the ET or other groups. • Provide an effective performance management framework that will strengthen risk control and provide greater levels of assurance. • Implement Data Governance Protocols as required, including in respect to the provision of Work Programmes and other related data in respect to Lift Safety to external Third Parties (including Contractors). • 	
<p>Compliance Manager – Project Delivery</p>	<ul style="list-style-type: none"> • Formulate Programmes of Work consistent with the delivery of this Management Plan and Policy. • Instruct/liaise with internal Operational Managers and those of external Contractors in respect to the operational delivery of this Management Plan. • Liaise with the Neighbourhood Management/Housing Team and tenants to explain the importance of Landlord Compliance as related to Lifts Safety and the need to achieve access to complete Safety Checks and Works. • Manage tenant feedback (enquiries, investigation and resolution of complaints, compliments) in respect to Lift Safety. • Liaise with the Compliance Data Team to ensure Stock Data and Landlord Compliance Data sub-sets are updated accurately and in time. • Liaise with the Compliance Data Team and ensure ICT System(s) and interfaces operate effectively and inform of any performance issues. • Receive feedback from Third Party External Validation Consultants and liaise with Contract Managers and Contractors (Internal and/or External) to address any delivery shortfalls. 	<p>Ongoing</p>

	<ul style="list-style-type: none"> • Monitor the quality and correct storage of all Certification and Documents required to demonstrate Landlord Compliance in respect to Lifts Safety. • Report all material issues of non-compliance (whether potential or actual) to the COO irrespective of whether this relates to a KPI scrutinised by the ET or other groups. • Oversee the preparation of the KPI/MPI and OPI reporting suite. • Take responsibility for ensuring that FHG Staff and all Contractors they employ have the skills, knowledge and expertise necessary to deliver the commitments outlined in the Lift Safety Policy. • Identify Competent Person(s) (Internal or External) suitable for the delivery of specific tasks. 	
Specialist Lift (LOLER) Safety Inspectors and Specialist Lift (LOLER & PUWER) Maintenance Contractors	<ul style="list-style-type: none"> • Operational delivery of Planned LOLER and PUWER Inspections • Implementation of Remedial Works arising from the Inspections. • Development of Lift Safety Maintenance and Servicing Programmes arising from the Inspections. • Review Property Addresses and reconcile with Contractor Databases to ensure the Programme remains accurate. • Liaise with Tenants in relation to arranging/keeping appointments. • Liaise with the Landlord Compliance Team in relation to access issues. • Update ICT System(s) with accurate data in line with Data Protocols. • Provide appropriate, complete and correct Certification for all Lift Safety works. • Provide Quality Assurance (QA) checks in accordance with the Contract. 	Ongoing
Competent Person(s)	<ul style="list-style-type: none"> • Raise any concerns about the Policy, Management Plan and associated Operational Guidance or their own competency for any task that they are being asked to undertake. 	Ongoing
Tenant	<ul style="list-style-type: none"> • Agreeing to and keeping appointments to provide access. • Liaise with FHG staff in relation to any poor service, failure to attend/poor repair etc. • Provide tenant satisfaction information. 	As required

	<ul style="list-style-type: none"> Take note of Lift Safety advice provided and follow the appropriate procedures (including in respect to on-site/scheme-based signage). 	
Independent External Auditor	<ul style="list-style-type: none"> Undertake 5% External Validation of Lift Safety Inspections in line with this Management Plan. 	Ongoing

Main Content

The key objective of this Policy is to describe how Flagship Housing Group will meet the required statutory, legislative and regulatory requirements in relation to Lift Safety. It will also cover how the Flagship Board, as Duty Holder, will receive assurance of statutory, legislative and regulatory compliance.

The scope of this Policy includes Passenger Lifts, Lifting Equipment, Stair Lifts, Vertical ('Through-Floor') Lifts, Ceiling Track Hoists, Mobile Hoists, Bath Lifts and Slings.

Flagship Housing Group will comply with all current and relevant legislation and specifically as detailed in the following:

- [LOLER \(Lifting Operation and Lifting Equipment Regulations\) 1998](#)
- [PUWER \(Provision and Use of Work Equipment Regulations\) 1998](#)

PUWER and LOLER apply in workplaces and in non-workplace Communal Parts that may be used by workers. They may also apply in properties that contain equipment used by people in a work capacity. Flagship Housing Group will assess each situation within individual dwellings and decide if it has become a workplace if support services are being provided.

Flagship Housing Group also acknowledges its obligations under the Health and Safety at Work Act (HASAWA) 1974 and Landlord Tenant Act 1985.

In addition, as a landlord and provider of Social Housing Flagship Housing Group must meet the requirements of the Regulator of Social Housing's (RSH) Home Standard.

It is essential to ensure tenants, contractors, staff and visitors remain safe in our premises (both individual homes and offices). Failure to properly discharge our statutory, legal or regulatory responsibilities may result in:

- Prosecution by the Health and Safety Executive under HASAWA 1974.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.

- RSH scrutiny and potential determination of a breach of the Home Standard and serious detriment having been caused/potentially caused.
- Reputational damage.
- Loss of confidence by stakeholders in the organisation.

Policy

To comply with statutory, legislative and regulatory standards and obligations, and to ensure the safety of our tenants, staff, contractors and visitors to our properties, Flagship Housing Group will:

Process

Provide clear lines of responsibility for the management of Lift Safety supported by written guidance in the Lift Safety Management Plan.

Ensure that a clear and consistent process including front-line engagement and enforcement is in place to obtain access to properties to undertake Lift Safety Checks, which shall include legal action when required.

Proactively assess available data for relevant information about the tenant to help gain access (disability, vulnerability, local connections, etc.).

Delivery

Ensure a Thorough Examination is undertaken, where applicable, to all Lifts and all its associated equipment by a Competent Person.

The Thorough Examination will be undertaken at no more than 6-month intervals for Lifts that carry people.

Thorough Examinations will be undertaken throughout the lifetime of the equipment, as follows;

- Before use for the first time.
- After assembly and before use at each location.
- Regularly, while in service.
- Following exceptional circumstances (damage or failure/major changes etc.).

Ensure the Thorough Examination Report contains information compliant with [LOLER Schedule1](#).

Undertake Supplementary Testing in accordance with the [Safety Assessment Federation \(SAfed\) Guidance if requested by the Competent Person](#).

Thorough Examination duties notwithstanding, ensure all equipment is maintained for the continued safety of staff, tenants, contractors and visitors and that it remains in a state of good repair.

The frequency and nature of maintenance will be based on a Risk Assessment. The current service intervals have been reviewed by a 3rd party consultant in mid 2022. The survey considered the following:

- The manufacturer's recommendations.
- The intensity of use.
- The operating environment (e.g. the effect of temperature, corrosion, weathering), user knowledge and experience.
- The risk to Health and Safety from reasonably foreseeable failure or malfunction.

New Passenger Lifts will be installed in accordance with [BS EN 81-20 and 81-50](#) and the Equality Act 2010.

Lift upgrade and refurbishment program will be implemented based on the findings from the 2022 review. Budget provision of £900k per year required for 5-year program.

Contractors Competency

For all Thorough Examinations and Supplementary Testing, use companies that are [UKAS Accredited to ISO/IEC17020](#) Standard.

Ensure that all Lifting Equipment works will be undertaken by trained and competent contractors with appropriate practical and theoretical knowledge and experience of the particular Lifting Equipment and have an element of independence and impartiality.

Use [Lift and Escalator Industry Association \(LEIA\)](#) affiliated contractors for all repairs, servicing and new installations.

Carry out an assessment of all contractor competencies annually or at change of contract/contractor, as detailed within the Lift Safety Management Plan.

Internal Competency

Maintain a Skills/Training Matrix to ensure that all staff undertaking key roles within the scope of this Policy have appropriate training.

Data

Maintain an up-to-date Master Database of all properties where Flagship Housing Group have a responsibility to provide Lift Safety Checks and maintenance.

For each relevant property, record and maintain up to date data confirming which Lifting Systems and Appliances within the scope of this Policy exist and do not exist and the organisation's associated responsibility.

Where a requirement exists hold data and certification as defined within the legislation, which is generally for the lifetime of the System/Equipment.

Hold Lift Safety Maintenance Records electronically in the Master Database, by the relevant Operational Department (to be specifically identified in the Lift Safety Management Plan), with other Landlord Compliance records. There may be instances where a hard copy is kept on site and these will be detailed again in the Lift Safety Management Plan.

Where a requirement does not exist hold appropriate evidence.

EIA statement

An Equality Impact assessment was undertaken on this policy on 04/07/23 and all identified negative impacts have been mitigated.

Training statement

This Lift Safety policy will be trained to the Compliance Team, Asset Management Team, Flagship Services and Gasway.

Supporting documents

This policy is supported by:

1. The Lift Safety Management Plan
2. The Lift Safety Operational Guidance Notes
3. The Landlord Compliance Policy

Measuring Effectiveness

Assurance

Ensure that all persons involved with Lift Safety are properly trained and accredited.

Carry out works-based assurance activity including checks on certification and post-inspection of on-site works to the level stated within the Lift Safety Management Plan. A proportion of such checks will be carried out by an Independent 3rd Party.

Set a timetable for the review of the Lift Safety Policy and the associated Lift Safety Management Plan.

Communication

Encourage tenants, through the provision of publicity information, to allow access to carry out Lift Safety checks, inspections and remedial works.

Implementation

This Policy is approved by Asset Management Committee and is effective from 10 July 2023.

Staff will be made aware of the Policy at priority training and a copy will be available on the Intranet and on the Board App. Where appropriate we will publish on our website.

This Policy should also be read in conjunction with the overarching Landlord Compliance Policy and Lift Safety Management Plan.

There will be training provided for all those staff involved with the operational delivery and implementation of the Landlord Compliance requirements and obligations in respect to Lift Safety detailed within this Policy.

Consultation

This Policy is based on statutory, legislative, and regulatory requirements and as such consultation with tenants has not taken place. There has been consultation with Internal Teams within Flagship Housing Group

Monitoring Performance

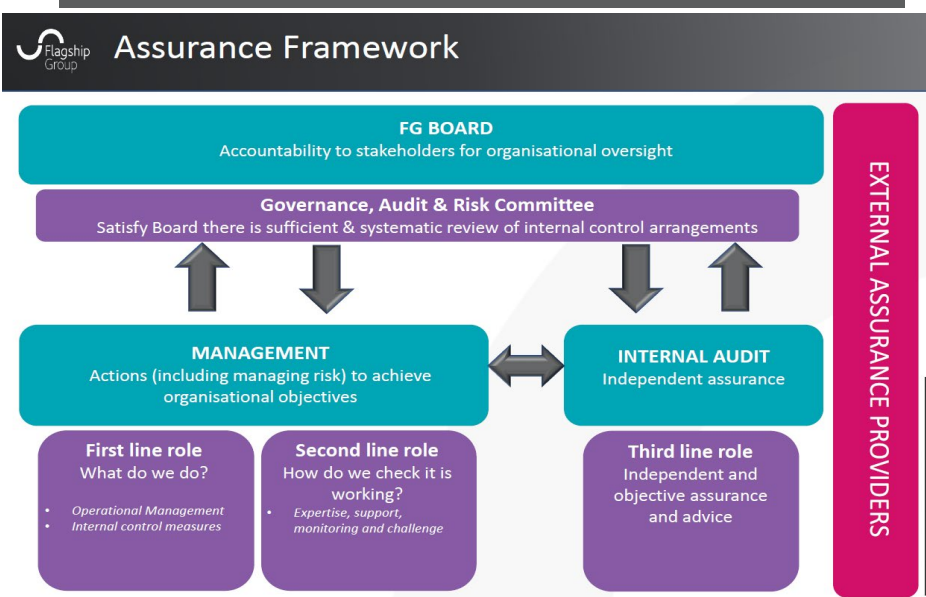
The following measures will be subject to reporting :

- % of Passenger Lift Service Inspections (against the stated Total Landlord Requirement) completed on time.
- % of overdue Passenger Lift Service Inspections.
- % of Stair, Hoists and Vertical Lift Service Inspections (against the stated Total Landlord Requirement) completed.
- % of overdue Stair, Hoists and Vertical Lift Service Inspections completed.
- % of Passenger Lift LOLER Inspections (against the stated Total Landlord Requirement) completed on time.
- % of overdue Passenger Lift LOLER Inspections.

Commentary will be provided for any installations out of date to include the date they became overdue, days overdue, and their position within the access legal process to bring them back into a compliant position. Commentary will also be provided if any installations have outstanding overdue actions or are out of use. Additional context commentary will also include information on the proportion of activities within the reporting period that were undertaken before and after their due date.

A detailed PI suite will be defined within the Lift Safety Management Plan.

Quality Assurance (QA) activity will be undertaken using our approach of three Lines of Defence (LOD) and typically over a three-year cycle. Outcomes of the audit program will be reported via the Flagship Group H&S Committee:



Review Period

This Policy will be reviewed annually or earlier if deemed necessary through the Performance Monitoring process.