Housing Health and Safety Rating System Management Policy

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Contents

1. Introduction
2. Policy statement
3. Roles and responsibilities
4. Monitoring and reporting
5. Complaints management
6. Reporting a hazard
7. Escalation
8. Key Performance Indicators (KPI)
9. Review and sign-off

1. Introduction

The purpose of this Housing Health and Safety Rating System (HHSRS) Policy is to set out specific guidelines which enable Two Rivers Housing to be assured it is fully compliant with its legislative responsibilities in relation to reports of all HHSRS hazards, ensuring hazards are inspected and rectified within the required timeframes of Awaab's Law Phase Two.

Two Rivers Housing is required by legislation (The Housing Act 2004) to ensure that all hazards are identified using the HHSRS. We will adopt the principles set out in The Social Housing (Regulations) Act 2023 including (Awaab's Law) and ensure that any HHSRS hazards reported are inspected within 14 calendar days where required, any emergency works are completed within 24 hours, and any urgent works will be started within seven calendar days of inspection. All non-urgent works will be started within 30 working days with the aim for work to be completed within 12 weeks. These timeframes are in line with our repairs policy work order priorities and Awaab's Law.

A written summary of investigation findings will be provided to the tenant within three working days (72 hours) of the completion of the inspection.

Damp and mould hazards are not including within this policy and have a standalone policy (Damp and Mould Policy). Any damp and mould hazards within our housing stock, are subject to full inspection and works. The inspection and works will be completed within the defined timeframes of Awaab's Law.

2. Policy statement

We acknowledge and accept our responsibilities under the Housing Act 2004, The Social Housing (Regulation) Act 2023, Landlord and tenant Act (section 11), Housing Act 1985 (as amended), Decent Homes Standard, Homes (fitness for habitation) Act 2018, Awaab's Law and the guidance Housing Health and Safety Rating System.

We will comply with all legislation and guidance issued by the government and other national standards in respect of the exposure of our tenants, employees and others to any hazard arising.

All managers responsible for the supervision of key functions will be adequately trained and ensure that staff with day-to-day operational responsibility are fully aware and trained to enable them to undertake their duties.

We will work with our tenants to ensure that any reported HHSRS case is investigated and, where necessary, works undertaken to rectify and improve our properties to provide a safe and healthy home in which to live. We will support and advise our tenants on how they can live in their homes in a way that minimises the potential of HHSRS risks occurring.

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We will proactively improve our homes by:

- Continuing to invest in our homes to make them more thermally efficient and ensure adequate ventilation is in place
- Carrying our servicing and maintenance of heating systems on a cyclical basis with assets recorded on our MIS asset management system.
- Carrying our servicing and maintenance of electrical systems on a cyclical basis with asset inspections recorded on our MIS asset management system.
- Ensure pest control programmes are in place, where identified and required.
- Carry out Fire Risk Assessments and Fire Risk Assessment reviews on a cyclical basis set out in our Fire Management Plan.
- Ensure common areas are inspected cyclically to ensure they are free from refuse, waste or belongings posing a fire risk.
- Ensure internal and external common areas are inspected to ensure there are no visible hazards such as falls on the level, on stairs, or between levels/surfaces)
- Ensure internal and external common areas are inspected to ensure there are no visible structural hazards posing a risk of collapse due to failing construction elements. Taking every opportunity during planned or programmed works to ensure our homes are free of HHSRS risks.
- Using technology to monitor the performance of our homes.
- Listen to our tenants and learn from complaints.
- Learning from our improvement works.

Where access cannot be gained for a damp and mould inspection, surveyors will make three attempts to inspect the property, recording attendance through case notes and photographs.

Following the third unsuccessful attempt, the damp and mould case will be closed and referred to Housing as a no-access case. A final letter will be issued advising the tenant that the case has been closed and will be reopened once they make contact to arrange access.

This approach will reduce repeat no-access visits, improve use of surveying resources, and allow greater focus on active damp and mould cases, while maintaining a clear audit trail of reasonable attempts to gain access.

This policy applies to all properties owned and managed by Two Rivers Housing but does not apply to Shared Ownership homes. We will, at prescribed regular intervals or at each time of a change of the legislation and regulations, review this policy and ensure compliance by audit on all aspects of the policy. We will also ensure that adequate financial resources are available for compliance with this policy.

3. Roles and Responsibilities

To ensure compliance of the Housing Act 2004, The Social Housing (Regulation) Act 2023, Landlord and tenant Act (section 11), Housing Act 1985 (as amended), Decent Homes standard, Homes (fitness for habitation) Act 2018, Awaab's Law (phase 2) and the guidance Housing Health and Safety Rating System, the following Individuals and/or teams have to the following responsibilities under this policy:

Executive and Assistant Director Team

Must give their full support to this policy to ensure that all practical hazard prevention measures are
taken and appropriate resources in the form of finance, equipment, personnel and time are made available in respect of HHSRS management.

Responsible Person

The Assistant Director of Repairs is responsible for:

- Ensure that the policy is followed at all times.
- Ensuring that the Key Performance Indicators (KPI), as listed in section 8, are completed in a timely manner are and accurate and presented the Executive Team, Assets Investment & Development Committee and Board, ensuring good governance and oversight

Deputy Responsible Person

The appointed Senior Maintenance Surveyor (Damp and Mould) will deputise the responsible person and be fully responsible for ensuring this policy is implemented in the absence of the responsible person.

The deputy responsible person will:

- Ensure that accountability is taken by maintenance surveyors for all HHSRS cases assigned to them
- Ensure that at least 10% of cases are quality audited monthly including a review of the case notes
- Complete and provide monthly KPI updates
- Provide weekly assurance reports to the Exec Team on the management of HHSRS cases

Maintenance Surveyors

- Ensure that all inspections are completed in line with an agreed appointment date and case severity is assessed, graded and updated at time of inspection

- Ensure that works are raised through the housing management system utilising the system diary note function for sharing the I-Auditor reports
- Ensure I-Auditor reports are provided to the repair's administrator and tenant's following inspection within 72 hours
- Ensure that the case notes are updated regularly in a timely manner and are accurate
- Ensure that the no access procedure is followed (with no exceptions)
- Ensure that all contractors are procured correctly in line with Two Rivers Procurement policy
- Ensure that all contractors meet their obligations as detailed within the policy
- Ensure that contractors are updating on work progress in a timely manner including committed start dates, work in progress information, completion dates and no access detail
- Ensure that all HHSRS remedial works are post inspected and contractor post inspection information is provided, including photographs and reports

Head of Health and Safety (Health & Safety Team)

- Ensure that all HHSRS training is recorded including renewal dates within the T100 H&S Management system
- Advise Leadership team on training requirements, frequency and suitable providers, issuing training schedules to the People Team to allocate training

Assistant Director of Neighbourhoods and Head of Income (Lettings Team)

- Ensure that no homes are let with a live HHSRS case
- Ensure that any HHSRS in TRH empty homes are reported to the customer service team and that a case is raised in a timely manner
- Ensure that lettings colleagues are adequately trained to carry out their duties

Head of Repairs Operations (Repairs Team)

- Ensure that HHSRS works are scheduled and completed in line with Awaab's Law and Repair Policy timeframes
- Carry out responsive and void repairs to Two Rivers Housing homes, removing and reporting HHSRS hazards wherever identified
- Ensure that access procedures are followed, and no access are reported to the housing team for escalation
- Ensuring diary notes, photographs and any other relevant documents are provided following completion of works
- Ensure that all sub-contractors meet their obligations as detailed within the policy
- Ensure that repairs colleagues are adequately trained to carry out their duties

Head of Neighbourhoods (Housing Team)

- Ensure that any HHSRS risks within a home are reported to the customer service team and cases are raised in a timely manner
- Ensure that the no access procedure is always followed
- Ensure that Housing colleagues are adequately trained to carry out their duties

Assistant Director of Data and Technology (IT Team)

- Ensuring that the ActiveH HPM system is adequate and working in line with the company's expectations
- Ensure that IT colleagues work with the repairs to ensure that the systems are updated and improved if required in a timely manner
- Ensure that IT colleagues are adequately trained to carry out their duties

Assistant Director of Customer Experience and Head of Customer Experience (Customer Service Team)

- Ensure that all HHSRS cases are raised in a timely manner through ActiveH and appointed to the correct maintenance surveyor
- Ensure that all HHSRS cases are triaged, utilising training and that a severity is assigned to each case when the initial case is raised
- Ensure that Customer Service colleagues are adequately trained to carry out their duties

It is the responsibility of all Two Rivers Colleagues to report any HHSRS risks within a Two Rivers Housing Home.

4. How we monitor HHSRS Hazards in our homes

We will:

- Provide easy and simple ways for tenants to tell us that they have a HHSRS risk within their home (repairs policy reporting methods).
- Regularly review the data we hold in repairs that help us determine the extent of the HHSRS cases under management
- Undertake an in-depth assessment of any home where we receive a complaint where a HHSRS hazard is identified.
- Attempt to contact those tenants who have little interaction with us to ensure that their living conditions are free from HHSRS hazards
- Ensure all colleagues who visit our homes have sufficient training and knowledge to identify and report HHSRS risks to our customer service team.
- Use modern technologies to monitor the condition within a home (such as the Switchee).
- Inspect all our homes once every five years to strategically monitor the condition of our homes.

- Have regular cyclical servicing and inspection programmes in place to reduce and eliminate hazards in and around the home.

5. How we will deal with complaints relating to HHSRS hazards

- We will never make judgements on the way tenants choose to live, if applicable.
- We will be open and explain to our tenants what we think is the cause of the problem within their home.
- We will act swiftly to undertake repairs when we identify improvements that are needed in our homes.
- We will ensure our technical staff are trained and have the appropriate equipment to ensure the correct diagnosis of defects is made and the correct remedial works are undertaken.
- Where cases are considered extensive or a potential category 1 hazard under the HHSRS, we will work with our tenants to ensure they are safe within their home, or we will find them urgent temporary accommodation until the problem has been resolved.
- We will use technology to monitor our homes and work with our tenants to take steps to make improvements where they are identified.

6. Reporting of a hazard

When a tenant tells us they have a HHSRS hazard in their home, we will take the following steps:

- All calls will be triaged by our customer service team. We have developed a series of questions to determine what course of action we need to take.
- All cases and calls will be recorded monitored and managed through our housing management system.
- All cases will have a priority score based on the severity of the hazard (Severe, Moderate or Slight) and the personal circumstances of the tenants and/or the residents.
- In cases where it is required, we will arrange for a maintenance surveyor or repairs trade team member to attend within the timeframes set out in the introduction and policy statement. A surveyor or team leader will attend within 24 hours if we believe that the hazard is Severe.
- Where we are either not sure at triage stage or where our surveyor visit was inconclusive, we will consider installing removeable digital monitoring equipment to assist with our diagnosis (overheating, excess cold etc).
- If following a surveyor visit and digital monitoring we cannot identify a cause, we will arrange for specialist investigations to take place.
- We will provide a named point of contact for our tenant, and we will keep them regularly updated on progress. We will also tell them how they can make a complaint if they believe works are not progressing as expected.
- We will arrange and carry out any works in line with the timeframes set out in the policy statement.

7. Key Performance Indicators (KPI)

TRH will report the following KPI's:

- Number of categories one HHSRS cases (Severe) reported within month
- Number of active HHSRS cases, grouped by severity (Severe and Moderate) and type at end of each month
- HHSRS Inspections (all types) completed within 14 calendar days
- HHSRS Inspection reports (all types of hazards) provided to tenants within 72 hours of inspection being complete
- Emergency repairs (where required) completed within 24 hours, including decants made if applicable
- HHSRS Urgent repairs completed within 7 calendar days

The KPI information will be provided to the Executive and Assistant Director team on a monthly and quarterly basis. The KPI information will also be provided to the Assets, Investment and Development committee and Group Board quarterly.

8. Escalation

Compliance and current performance will be reported through to the leadership team, Asset, investment and development committee and TRH Board as described in section 7. However, if there is at any time the need to escalate a significant concern, the below flow chart will show the route of escalation:



Following the Chief Executive being notified of a Severe Hazard, they will escalate to the Chair of the Board if there is a requirement to do so.

9. Review and sign-off

The Executive Director of Homes and Assistant Director of Repairs will be responsible for ensuring that this policy is reviewed regularly.

The policy will be reviewed two yearly, unless any changes to current legislation that may affect this policy are implemented. In this case the review of the policy will take place immediately.

Next review due in: October 2028