



Property Compliance Policy Statement

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Service area: Property Services
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Scope		Entity		Business Stream	
Customers	✓	Progress Housing Group Limited (Parent)	<input type="checkbox"/>	Progress Homes	✓
Colleagues	✓	Progress Housing Association Limited (PHA)	✓	RWP	✓
Non-Executive Directors / Trustees	✓	Reside Housing Association Limited (RHA)	✓	Progress Lifeline	<input type="checkbox"/>
Third parties*	✓	Key Unlocking Futures Limited (Key)	✓	Progress Living	✓
*Other:	Tenants, support providers, contractors, commissioners, landlords				
Exclusions:					

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Section 1: Purpose and Policy Statement

1. Purpose

- 1.1 This is an Overarching Property Compliance Policy which outlines how the Group will meet its obligations to ensure its customers' homes remain safe and compliant. The Group will as a minimum, meet all statutory and regulatory requirements and, where appropriate, will follow best practice guidance.

2. Policy statement

- 2.1 The Group is committed to maintaining safe, healthy, and sustainable homes for its tenants. This is delivered by working in a way which fully complies with the Health and Safety at Work Act 1974, Consumer Standards, and any other further regulatory and property compliance standards. The Group will:
- ensure that property compliance is at the forefront of all decision-making processes, to meet the requirements of the Safety and Quality Consumer Standard.
 - ensure transparency of performance in relation to all compliance areas throughout the organisation
 - continually improve and develop compliance management systems to manage, oversee and effectively monitor performance.
 - embed a culture that actively encourages open reporting and seeks to learn from actions and feedback, enabling employees to act and be accountable.
 - ensure clear responsibility within each area of compliance is detailed within the relevant policy and procedures and that relevant knowledge, skills and training is in place to enable employees to fulfil the obligations of their role.
- 2.2 This policy does not cover general repairs and maintenance requirements of the organisation, nor wider asset management requirements for example compliance with the Decent Homes Standard. This is covered in the Group Asset Management Strategy.

Section 2: Policy Guidance

3. Direction

- 3.1 This overarching policy covers the key property compliance policies, which are summarised below.

Gas Servicing, Solid Fuel and Heating Policy

- 3.2 The Group will hold accurate and up to date inspection records against each property it owns or manages.
- 3.3 The Group will visit all properties on an annual basis to carry out gas and/or heating safety checks, irrespective of whether the property has a gas supply or not (other than those properties not on a gas mains network). This includes a minimum 10% ongoing quality assurance audit.
- 3.4 The Group will test smoke alarms and CO detection in all domestic properties as part of the annual gas safety check.

Fire Safety Management Policy.

- 3.5 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirement for servicing, maintenance and repair of fire prevention, detection and fire-fighting equipment.
- 3.6 The Group will establish and manage programmes to deliver servicing and maintenance in accordance with all relevant recommendations for all fire detection, prevention and fire-fighting systems and equipment within buildings owned or managed by the Group.
- 3.7 The Group will carry out a Fire Risk Assessment (FRA) programme, ensuring that all FRAs are completed, no later than the date stated in the current FRA and that this is carried out by a competent fire risk assessor (annually, 2 yearly, 3 yearly or 4 yearly, based on the risk profile of the property). This includes a minimum 5% ongoing quality assurance auditing.
- 3.8 The Group will ensure that processes are in place to implement all mandatory fire precaution measures identified by FRAs.

Electrical Safety Management Policy.

- 3.9 The Group will hold accurate and up to date records against each property it owns or manages, identifying when the electrical installation was last inspected and tested and when re-inspections are next due.
- 3.10 The Group will deliver a comprehensive programme of testing and inspection of all property types on a five-year cycle. This includes a minimum 10% ongoing quality assurance audit.

- 3.11 The Group will ensure that a full electrical installation inspection retest is undertaken in the case of a change of occupancy for all properties with the exception of Progress Living accommodation and void rooms in shared RWP properties due to the fact that these tenancies are for rooms whose occupants can change on a regular basis. All such properties will still be subject to the 5 yearly periodic inspection programme.

Asbestos Policy

- 3.12 The Group will hold accurate and up to date records against each non-domestic property it owns or manages, identifying whether the property has had its initial asbestos management survey and when the next re-inspection is due, if applicable. This includes a minimum 5% ongoing quality assurance audit for all reinspection surveys.
- 3.13 The Group will ensure that any non-domestic properties that contain asbestos have a re-inspection survey and an assigned re-inspection date where applicable. The frequency of inspection will depend on the location of the ACMs and other factors which could affect their condition, e.g. the activities in the building, non-occupancy etc. There will also be events or changes, e.g. maintenance work, new tenants or employees that should also trigger a review of the inspection date.
- 3.14 The Group has an Asbestos Management Plan and an asbestos register, which holds records of the assets where asbestos containing materials (ACMs) are present.
- 3.15 The Group will ensure that information about ACMs is available to every person likely to disturb them, whether accidentally or during the course of planned works, including tenants, employees, and contractors.

Water Hygiene Policy

- 3.16 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirements for water hygiene risk assessments and safety checks.
- 3.17 The Group will periodically review risk assessments no later than the review date set by the Legionella Risk Assessment or based on the determined level of risk of the property.
- 3.18 A written scheme of control will be developed and fully implemented for all properties risk assessed as requiring controls to adequately manage the risk of legionella exposure. In addition, a minimum 5% ongoing quality assurance audit for all risk assessments undertaken.

Lifting Equipment Policy

- 3.19 The Group will hold accurate and up to date records against each property it owns or manages identifying all lifting equipment and assess the nature and level of risks including those associated with the lifting operation.
- 3.20 The Group will ensure that there is an effective inspection and maintenance programme of all lifting equipment where required.
- 3.21 The group will ensure that a minimum 5% of all servicing undertaken on passenger lifts will be audited for quality assurance.

Radon Policy

- 3.22 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirements for radon monitoring.
- 3.23 The Group will periodically re-measure radon levels at intervals of no more than 10 years and review radon affected properties at intervals of no more than 5 years.
- 3.24 Where mitigation systems have been installed, radon levels will be re-measured at intervals of no more than 2 years.

Third Party Responsibilities

- 3.25 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirements for any 3rd Party landlord that may be involved.
- 3.26 In properties where the Group does not have responsibility for compliance, or completing the compliance checks, because there is a landlord or other third party with this responsibility, the Group will ensure that evidence is obtained and held for each of the respective areas of compliance above if applicable). This is done in line with the procedure for managing 3rd party landlord compliance.

4. Roles and Responsibilities

- 4.1 A summary of the key roles and responsibilities is included below:

The Board

- 4.2 The Parent Board has overall governance responsibility for ensuring that all compliance policies are implemented to ensure full compliance with all regulatory standards, legislation and approved codes of practice.

Senior Leadership Team

- 4.3 The appointed duty holder role is fulfilled by the Director (Property Services) on behalf of the Group to ensure the appropriate management of

the risks associated within each compliance area. Although the Group has an appointed duty holder, the Group's Chief Executive is ultimately responsible for ensuring compliance with current legislation.

Heads of Service

- 4.4 The Head of Property Compliance and relevant Compliance Managers shall ensure that there are suitable arrangements in place for the implementation of all compliance policies as well as overseeing the delivery of the agreed survey inspection programmes and the prioritisation and implementation of any works arising.

Customer responsibilities

- 4.5 The Consumer Standards set out expectations for the Group to provide tenants with accessible information in respect of the legal obligations and relevant regulatory requirements that Registered Providers must meet in connection with their homes. The Group will:
- 4.5.1 ensure that information is available to tenants at sign up, and on the website relevant to their homes and communal areas.
 - 4.5.2 compliance data is available to tenants on request.
 - 4.5.3 ensure tenants are made aware of PHG responsibilities and tenant responsibilities at the time of sign up.
 - 4.5.4 ensure tenants are aware of how to raise concerns or issues with health and safety within their homes.
 - 4.5.5 ensure reasonable adjustments are considered where appropriate.
- 4.6 Tenants must not do anything which may compromise the safety of their homes.
- 4.7 Tenants are expected to provide access to their homes in line with their tenancy agreement. Failure to do so will result in appropriate sanctions being taken to ensure access and safety of the home and surrounding properties.
- 4.8 Where tenant damage occurs, tenants will be recharged.
- 4.9 Where tenants wish to undertake works to their home, prior consent is required from the Group.

Stakeholder responsibilities

- 4.10 The Group is accountable to the **Regulator of Social Housing (RSH)** and compliance with the regulatory standards. Registered Providers must communicate in a timely manner with the RSH on all material issues that

relate to non-compliance or potential non-compliance with the consumer standards.

- 4.11 The Group leases a number of properties and as such works with **Landlords** to ensure and maintain property compliance where responsibility lies with them. This is referred to as third party responsibility and is covered by the Procedure for Managing 3rd Party Landlords' Compliance Activities.
- 4.12 RWP works with a number of **support providers** delivering care and support to tenants living in properties managed by the Group. Responsibilities of the Support Providers relating to compliance activity is set out in a responsibility matrix, management agreement or service level agreement.
- 4.13 RWP works with **commissioners** nationally and will liaise with them when compliance activity requires intervention or a change in service provision to protect the health and safety of tenants in their homes.
- 4.14 The Group engages with **contractors** to deliver various aspects of compliance activity. Individual compliance policies set out the standards expected of contractors delivering services for the Group. Contractors will be required to evidence the qualifications and capabilities of employees delivering works for the Group.

5. Training

- 5.1 The Group will ensure that all relevant staff, contractors and suppliers working for, or on behalf of the organisation have the relevant qualifications required for their role, and this will be reassessed annually to ensure compliance with standards is maintained.

Section 3: Legal and regulatory

6. Legislation

- 6.1 All relevant legislation, approved codes of practice and guidance relevant to each of the compliance risk areas is fully listed in each compliance policy.

7. Definitions

The Group	Progress Housing Group Limited (and subsidiary companies specified within the entities section)
Progress Homes	The brand name the Group uses when referencing general needs and independent living homes
RWP	The brand name the Group uses when referencing supported living homes

8. Associated policies and procedures

Document reference	Name of document
EIA01	Equality impact assessment
GRPOLPS01	Asbestos Policy
GRPOLPS02	Electrical Safety Management Policy
GRPOLPS03	Fire Safety Management Policy
GRPOLPS04	Gas Servicing, Solid Fuel and Heating Policy
GRPOLPS05	Water Hygiene Policy
GRPOLPS06	Lifting Equipment Policy
GRPOLPS07	Radon Policy
GRPROPS01	Portable Appliance (PAT) Testing Procedure
GRPROPS02	Electrical Testing Procedure
GRPROPS04	Gas & Heating Procedure
GRPROPS05	Water Hygiene Safety Procedure
GRPROPS14	Asbestos Management Plan
GRPROPS20	Fire Safety Management Procedure
GRPROPS23	Procedure For Managing 3rd Party Landlords Compliance Activities
TBC	Lifting Equipment Procedure
TBC	Radon Procedure

9. Equality impact assessment

- 9.1 An EIA has been completed for each of the overarching key compliance policies that feed into this policy and covers this policy. There was found to be no material impact on any protected characteristics.

10. Data protection

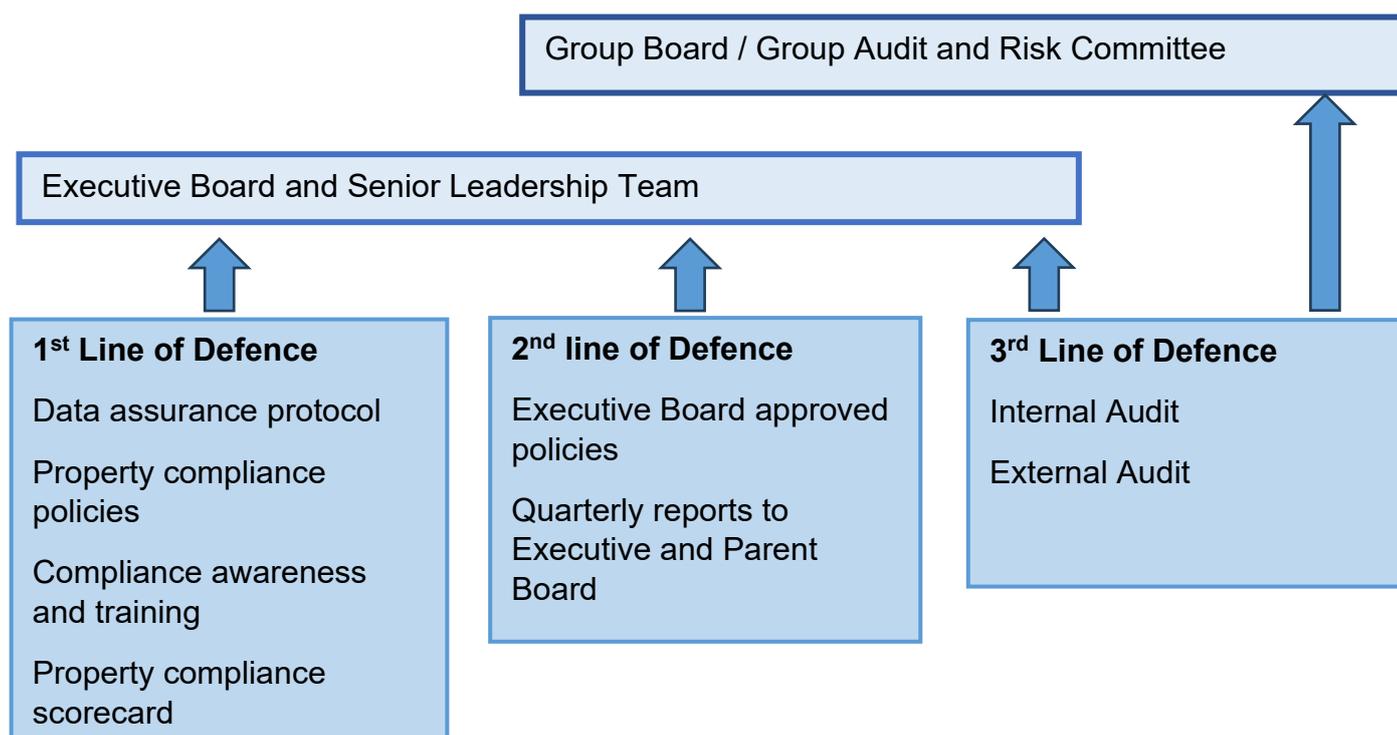
- 10.1 The need for a data protection impact assessment (DPIA) as a result of this policy has been reviewed and a DPIA for the Overarching Property Compliance Policy Statement is not required.

11. Customer Voice and influence

- 11.1 Colleagues within the organisation have previously been consulted on the key property compliance policies that feed into this overarching policy.
- 11.2 A series of consultation meetings with the Tenant's Forum were held when carrying out previous reviews of these key compliance policies. As such, some changes were made, which included developing easy read leaflets for the areas of compliance, a Tenant's Scrutiny exercise was conducted on the EICR process, the Group publishes information relating to compliance related activities on the website and members of the compliance team attend the Tenants Forum meeting. There is no consultation requiring an input from tenants or customers needed for this policy.

12. Monitoring and review

- 12.1 Compliance activity is monitored using the three lines of defence approach.



- 12.2 **First line of defence** – compliance scorecard reported to Senior Leadership team monthly.
Second line of defence – Compliance scorecard reported to Executive Board quarterly and the parent board receives a condensed version of the Property Compliance Scorecard on a quarterly basis.
Third line of defence – Internal and external audits completed.
- 12.3 The internal audit requirements for property compliance are as set by the Group Audit and Risk Committee.
- 12.4 The Group will commission an independent audit encompassing all compliance activities at least once every three years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues. The audit will also look at and test processes to ensure that they are being adhered to and are still fit for purpose.
- 12.5 Corporate reporting is provided through monthly reporting of the full property compliance scorecard to the Senior Leadership Team and quarterly to the Executive Board. Any major instance of statutory non-compliance will be reported to the Executive Director (Operations, Services and Support) immediately, with further reporting to the relevant board(s) and decision regarding reporting to the Regulator as determined by the Parent Board.
- 12.6 The Group will keep all necessary compliance records in relation to the management of servicing, maintenance, asset information and audit records.

This policy will be reviewed every three years unless an earlier review is prompted by an external or internal change.