

Property Compliance Policy

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1. Document Overview

Purpose	To provide a clear overview of the key health, safety and compliance responsibilities for the big 6 (gas, electric, fire, water, asbestos and lifts) which Thrive has as a landlord		
Audience	All Thrive colleagues and board members		
Data Classification	For internal use only		
Review Cycle	24 months		
Last Review	June 2025	Next Review	June 2027
Relevant Legislation	The Gas Safety (Installation and Use) (Amendment) Regulations 2018 (legislation.gov.uk) The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 (legislation.gov.uk) The Control of Asbestos Regulations 2012 (legislation.gov.uk) The Water Supply (Water Fittings) Regulations 1999 (legislation.gov.uk) Legionnaires' disease: The control of legionella bacteria in water systems. Approved Code of Practice and guidance on regulations L8 (hse.gov.uk) Fire Safety Act 2021 (legislation.gov.uk) The Fire Safety (England) Regulations 2022 (legislation.gov.uk) Building Safety Act 2022 (legislation.gov.uk) The Regulatory Reform (Fire Safety) Order 2005 (legislation.gov.uk)		

	The Electricity at Work Regulations 1989 (legislation.gov.uk) The Electrical Equipment (Safety) Regulations 2016 (legislation.gov.uk) The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 (legislation.gov.uk) The Lifting Operations and Lifting Equipment Regulations 1998 (legislation.gov.uk) The Lifts Regulations 2016 (legislation.gov.uk)
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2. Document Version History

Version	Date	Author	Reviewer	Changes & Additions
V9.0	16/04/18	E Murphy	Leadership Team	Combine existing policies into one overarching framework
V9.1	06/07/21	E Murphy	Leadership Team & Safe & Well WG	Update following enactment of the Fire Safety Act 2021 Added section for lift safety Added glossary of terms
V9.2	29/07/21	E Murphy	Risk and Audit Committee	Added Equality and Diversity impact assessment back into the policy and completed the assessment.
V9.3	05/05/23	C Gritzner / D Raitt	Leadership Team & Safe & Well WG	Added Asbestos encapsulation and repair, smoke and carbon monoxide regulation, and updated fire safety legislation
V9.4	31/3/25	C Gritzner/ D. Raitt E Murphy	Leadership Team & Customer WG	New template Review key legal requirements Roles and responsibilities section added Added quality assurance Added non-compliance events

3. Introduction

We have a duty of care to make our best endeavours to comply with the appropriate compliance legislation and regulations, to ensure that our homes and communal areas are safe for our customers, their visitors, contractors, and our colleagues in accordance with the principles in our Strategic Framework to keep customers safe and well. By delivering against the standards set out in this policy, we will ensure Thrive meets its obligations under the Safety and Quality Consumer Standard and the Governance and Financial Viability Standards published by the Regulator for Social Housing to:

Meet all applicable statutory requirements for the big 6 that provide for the health and safety of the occupants in their homes.

Thrive also publishes its Tenant Satisfaction Measures (TSM), which include 5 safety check measures, allowing customers to review our performance against other Landlords.

4. Scope

This policy covers all homes and communal internal spaces owned by and managed by Thrive, including any subsidiary business. Leaseholders and Shared Owners are responsible for their own property as per individual lease agreements. If the compliance obligation is in a communal then we are responsible.

This policy excludes operational details of day-to-day management, these details can be located in the relevant procedures. It also excludes HHSRS (Awaab's Law including damp & mould) as it is dealt with in the HHSRS policy and associated procedure.

5. The Big 6 H&S compliance areas

Thrive customers feeling and being safe remains a key priority for us. Therefore, we must understand the legal framework that underpins our approach to monitoring and checking the areas listed below:

1. Gas boilers and any other Thrive-owned gas appliances/systems, including smoke, heat and carbon monoxide alarms
2. Asbestos in the home and/or common parts
3. Water hygiene
4. Fire safety
5. Electrical safety, specifically fixed wiring
6. Passenger lifts, hoists, through-floor lifts and stairlifts.

Thrive will put in place appropriate contracting arrangements, management systems (including post inspections), reporting, and internal/external auditing and assurance processes to make sure we effectively manage, monitor, record and comply with all the health and safety aspects of these 6 significant risk areas.

Thrive will ensure we use only competent, qualified, and appropriately registered/licensed/competent colleagues and contractors to carry out property compliance works and check these on an annual basis. Thrive will provide appropriate training to colleagues and continue to embed a culture of continuous improvement and best practice.

Thrive will ensure that all colleagues and contractors involved in the delivery of landlord property compliance are fully aware of the relevant procedures/management plans, and these are followed.

Through the Balanced Score Card, TSM's, monthly and quarterly reporting and associated appendices, we will record our compliance position, including any remedial works/actions with a view to always reaching 100% compliance in all areas.

Thrive will ensure that customers are appropriately communicated/engage with regard to landlord property compliance and how to manage risks, such as, but not limited to

- reporting mechanisms
- access arrangements
- the presence of asbestos in their home
- building safety, including fire strategy

6. Gas Safety

This policy operates within the context of regulatory legal frameworks as follows:

- Gas Safety (Installation and Use) (Amendment) Regulations 2018.
- Compliance with HETAS guidance (solid fuel systems).
- Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022

Gas servicing covers the provision of cyclical servicing, safety checks and related repairs where there is a natural gas domestic installation present.

To maintain compliance, Thrive will: -

- Ensure that gas pipework, appliances, fittings, and flues installed are safe for use.
- Undertake an annual gas safety check, following our process to agree access with the customer.
- Ensure that at least 1 smoke alarm is installed on each level of the property.
- Ensure a carbon monoxide alarm is equipped in any room used as living accommodation where there is a gas-burning appliance.
- Ensure a smoke or carbon monoxide alarm that is reported as faulty is repaired or replaced.
- Seek to repair faults on damaged items, rather than a full replacement, when it is safe and cost-efficient to do so.

- Where a non-compliance event is triggered, the gas procedure will be followed to ensure all properties are tracked and returned to compliance as soon as possible.

In addition to the requirements of the gas legislation, on an annual basis, Thrive will: -

- Undertake a visual check of the customer's own mains gas appliances (cooker).
- Ensure that an annual check is carried out on all immersion heaters.
- Maintain unvented cylinders.
- Inspect gas carcass/meters.

7. Asbestos Management

This policy is designed to meet the obligations as set out within the Control of Asbestos Regulations 2012, regulation 4, regarding the Management of Asbestos within all non-domestic premises and the common parts of domestic premises. Under this regulation, Thrive has a duty to manage the risk of any person being exposed to asbestos dust, applying equally to colleagues, customers, visitors and contractors.

To maintain compliance, Thrive will: -

- Survey 100% of communal areas where asbestos has previously been identified (pre-1999) communal areas on an annual basis in accordance with our legal obligations
- Aim to survey (access permissible) 100% of domestic properties to determine and record where asbestos is present, cloning surveys where access is not achieved.
- Assess the most suitable risk-based approach where asbestos is present – manage, repair, encapsulate or remove.
- Provide contractors and colleagues with digital copies of R&D surveys upon request, along with providing colleagues with digital access to the asbestos register to ensure everyone understands any asbestos hazards and work safely.
- Follow the asbestos management plan in the event of non-compliance.

8. Water Hygiene

This policy is designed to meet the obligations as set out within The Water Supply (Water Fittings) Regulations 1999 and is designed to address all risks associated with the use of stored hot and cold-water systems. Our procedure sets out how we will follow the HSE's Approved Code of Practice and Guidance L8 "Legionnaires' disease: the control of legionella bacteria in water systems, The HASAWA 1974: The Control of Substances Hazardous to Health Regulation 2002 and the HSG 274 Part 2 Legionnaires Disease: technical Guidance.

To maintain compliance, Thrive will: -

- Identify and assess the risks of legionnaires' disease in all hot and cold-water storage systems,
- Prepare a course of action to prevent or control the risk of legionella where possible.

9. Fire Safety

This policy is designed to meet Thrive obligations set out within the following key pieces of legislation and regulation:

- The Fire Safety Act 2021
 - The act requires the Responsible Persons of multi-occupied residential buildings with two or more sets of domestic premises to update their fire risk assessment of the building structure, external walls and flat entrance doors.
- Building Safety Act 2022
 - This act sets out safety requirements for landlords of higher-risk buildings for buildings over 18 metres in height or seven storeys and above. It introduces the Building Safety regulator, the responsibilities for the duty holders, construction gateways, the Principal Accountable Person, the Golden Thread of information and mandatory occurrence reporting.
- Fire Safety (England) Regulations 2022

- These regulations will require the responsible person to provide prescribed information to the fire and rescue service on key firefighting equipment for specific buildings, the introduction of fire door inspections on flat entrance doors and communal fire doors and provide fire safety information to all multi-occupied residential buildings with two or more sets of domestic premises.
- Regulatory Reform (Fire Safety) Order 2005
 - The order has been amended to ensure that external walls and flat entrance doors are included in the fire risk assessment.
- The Housing Act 2004 also sets out the Landlord's responsibilities regarding Hazards and Enforcement Action.

Thrive operates a 'Stay Put' policy in all of the flat blocks unless stipulated by the fire strategy for the building, the customers feel it is not safe or directed by the Fire and Rescue Services.

To maintain compliance, Thrive will:

- Undertake suitable and sufficient fire risk assessments of sheltered schemes and flat blocks.
- Maintain appropriate compartmentation to support the 'Stay Put' Policy
- Undertake fire door inspections for all buildings in scope - flat entrance doors annually and communal doors quarterly.
- Ensure there are suitable physical fire controls.
- Identify vulnerable customers, such as those with impaired mobility, hearing or vision, prepare a person-centred risk assessment and inform the local fire and rescue service with the permission of the customer and/or in accordance with GDPR
- Prioritise recommendations from fire risk assessments and develop a management action plan.

10. Electrical Safety

This policy will comply with the 18th Edition (2nd Amendment) of the Wiring Regulations, with strict regard to the latest edition of BS7671 for electrical testing and inspection and for all electrical re-wiring or upgrade work to meet the latest edition of this British Standard and Part 'P' of the Building Regulations. Appropriate certificates will be provided following inspections and works.

Key documents and legislation (as well as their various amendments) relating to the use of electricity include the following:

- Electricity at Work Regulations 1989.
- Electrical Equipment (Safety) Regulations 2016.
- Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- Relevant editions of Part "P" of the Building Regulations.
- Relevant editions of the IEE (Institute of Electrical Engineers) Wiring Regulations.
- Electrical Safety Council Best Practice Guide, issue 2a covering Periodic Inspection and Testing.

To maintain compliance, Thrive will:

- Carry out electrical installation inspections every 5 years in accordance with the latest guidance.
- Prioritise recommendations noted on electrical inspections and develop management action plans to implement appropriately.

11. Lift Safety

While there is no legislative framework for domestic and passenger lifts, this policy will comply with the manufacturer's instructions/guidance and LOLER guidance.

To maintain assurance, Thrive will: -

- Carry out annual Runways Trolleys and Lifting Point LOLER inspections, and 6-monthly Hydraulic LOLER inspections of passenger lifts.

- Carry out monthly/bi-monthly passenger lift inspections as appropriate.
- Carry out regular auditing of compliance and the process which includes Thrives insurance company completing regular inspections of the work carried out by the contractor as part of the LOLER.
- Prioritise recommendations in accordance with the risks identified.

12. Roles & Responsibilities

The roles and responsibilities for key stakeholders across Thrive Homes are detailed below:

The Executive Director Corporate Services and Director Business Assurance & Risk will ensure that adequate budget and resources are made available to ensure compliance with requirements of relevant legislation, regulation and consumer standards. They will ensure this policy is implemented and the health, safety and wellbeing of our customers remains a key focus of the team, and that reporting is accurate and fit for purpose.

The Leadership Team, Board and Customer, Colleague and Governance Forum (CCGf) and Committee (CCG) will review and receive assurance quarterly from the Health, Safety and Wellbeing report that Thrive is compliant with the requirements of legislation/regulation set out in this policy.

Head of People & Property Safety and Compliance & Assurance Lead are responsible for the operational delivery of and monitoring compliance with this policy and associated policies and procedures. They will ensure Thrive Homes remains compliant with current legislation requirements, further legislation, and best practice guidance.

The Compliance and Fire Safety teams are responsible for the overall management and delivery of the Property Compliance Policy, have a good knowledge and understanding of the compliance legislation, regulation, best practice, compliance programmes, properties and customers, act as our focus when working with customers. The team will ensure accurate records are kept and provide training and advice, and work with relevant colleagues to resolve access challenges, and any issues or concerns will be raised with their manager.

Customers are responsible for allowing access to complete property safety checks and reporting any issues that may impact on the safety of them, their family & visitors.

Contractors/consultants working for or on behalf of Thrive are responsible for compliance with this policy including the competence of their colleagues

Clearly defined roles and responsibilities are set out each procedure/management plan, which supports this policy.

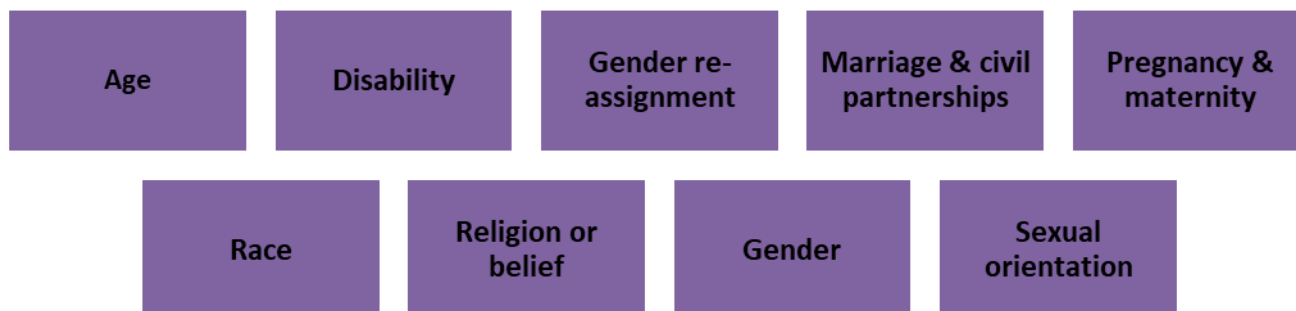
13. Thrives Core Behaviours

Tuned-in	To ensure customers are safe and feel safe in their homes.
Curious	Always looking at processes to make sure we deliver a great service to our customers
Smart, Can do	We strive to be 100% compliant
Ownership	To ensure all compliance procedures are followed.
Pride	Working together to get the best outcome for our customers.

Customers and colleagues are entitled to hold us accountable if we behave in a manner that isn't in keeping with the statements above. To be clear, that doesn't mean we can always deliver exactly what is being sought, but it does mean we demonstrate empathy and provide clarity.

14. Treating Everyone with Respect

This policy has been impact assessed in line with Thrive Homes' obligation to comply with the Equality Act (2010). We aim to design inclusive services, policies and behave in a way that does not discriminate on the grounds of:



While we are not required by law, we seek to ensure we do not discriminate on any basis that is rooted in prejudice, for example, we are not influenced by:



Every effort will be made to ensure that decisions made reflect this commitment.

15. Other Related Policies and Guidance

This policy links to other policies Thrive has in place, including but not limited to:

- Thrive Homes Tenancy Agreement
- Health, Safety and Wellbeing Policy
- Service Charge Policy
- Void Policy
- Building Safety Policy
- Thrive Offer and Ask document
- The Thrive Home Plan inspection programme
- The Asbestos Management Plan
- The Homes Standard – RHS
- The Governance and Financial Viability Standard - RHS
- Thrive Homes Strategic Framework
- Tenant Satisfaction Measures
- Consumer standards – Safety and Quality Standard
- HHSRS Policy and associated procedure

As a business, we try hard to keep all these related policies aligned with each other. Anyone spotting inconsistency or contradictory statements, is asked to contact the Author and make concerns known. Supporting us to keep information clear and consistent will always be welcomed.

16. Risk and Assurance

The commitments and intent of this policy is aligned to our Strategic and Risk & Assurance Frameworks, specifically:

Strategic Framework Pillar	Corporate Risk Register
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Customer Experience	Risk and Assurance
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To ensure we hold ourselves accountable, we will, on a biennial basis, assess our adherence to this policy, reporting the assessment of compliance to the appropriate business forum.

All compliance areas are audited by internal audit on a three-year cycle, with an in-depth health check completed every three years. Individual compliance areas have quality checks completed monthly; this is clearly defined in the procedures.

17. Policy Review & Approval

As this policy is a core component of how Thrive manages its business, the document will be evaluated by the CCG Forum, Customer Working Group, CCG Committee and Thrive Board as part of the review and approval process.

18. Support and Further Guidance

This policy has been drafted with input from colleagues across Thrive. Any concerns on how to interpret or follow its requirements, can be raised with members of the Compliance or Fire Safety Team.

Colleagues, Board Members and third parties have a responsibility to work in a way that's consistent with the expectations set out in the policy and its implied intent. Should anyone witness or become aware of activities that undermine or conflict with the intention of this policy, please alert a member of the Governance Team or any member of the leadership team as soon as possible.