



## **Asset Compliance Management Policy**

Date Effective: May 2021  
Date of Review:



Registered Scottish Charity No: SC042551

## **1. Purpose**

The aim of this policy is to ensure Riverside Scotland (the trading name for Irvine Housing Association) as a subsidiary of The Riverside Group (TRG) provides safe houses to our customers and a safe working environment for our staff, contractors and those affected by our activities.

This policy sets out the overarching principles and objectives which underpins Riverside Scotland's approach to compliance management and how this reflects and is aligned with TRG's wider Compliance Strategy and framework. The policy details the legal and regulatory requirements applicable to ensure effective and safe asset compliance management, and sets out specific areas of compliance deemed to be key risks to the achievement of Business Plan objectives, namely: Asbestos Management, Gas Safety, Fire Safety, Lift Management, Electrical Safety and Legionella Safety.

The application of this policy ensures that Riverside Scotland will implement effective compliance management and complies with the outcomes of the Scottish Social Housing Regulator, specifically in relation to the 'Healthy, Safe and Secure' elements of the Scottish Housing Quality Standard, and all applicable requirements that provide for the health and safety of the occupants in their homes.

Riverside Scotland acknowledges and accepts that failure to discharge these responsibilities may result in:

- Prosecution by Health and Safety Executive under Health and Safety at Work Act 1974.
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.
- Housing Regulator Enforcement Action

## **2. Scope**

This policy applies to all properties owned or managed by Riverside Scotland, or places of work for Riverside Scotland staff. This includes houses, flats, any rented accommodation, communal areas and garages. Riverside Scotland does not (normally) hold a duty of care to leaseholders, or shared owners, for asbestos located within the property.

## **3. Legal and Regulatory Context**

The legal framework for compliance management is provided by the Health and Safety at Work etc. Act 1974, whose premise and main principle is that those who create risk from work activity are responsible for the protection of workers and the public from any consequences, so far as is reasonably practicable. Legislation which is relevant to Riverside Scotland's overall Compliance Management approach includes:

- The Management of Health and Safety at Work Regulations 1999

- The Workplace (Health, Safety & Welfare) Regulations 1992.
- Environmental Protection Act 1990
- The Reporting of Injuries, Diseases and Dangerous Occurrence Regulations (RIDDOR) 2013.
- The Control of Substances Hazardous to Health (COSHH) Regulations 2002.
- Housing (Scotland) Act 2001
- The Provision and Use of Work Equipment Regulations (PUWER) 1998.
- Occupier Liability (Scotland) Act 1960.

#### 4. Strategic Context

Riverside Scotland as a subsidiary company of TRG will adopt the principles of TRGs wider strategic Compliance Framework, which will include the following elements:

Asset Compliance Strategy	The Asset Compliance Strategy sets out our vision, aims, objectives and strategic priorities.
Compliance Operational Management Framework	This translates our vision, objectives and introduces a compliance management model to provide guidance to staff on managing our risks to ensure we meet our statutory and regulatory obligations.
Strategic Risk Assessment	This sets out our approach to our Landlord Health and Safety Compliance assessment and identifies the key strategic health and safety risks for Riverside Scotland.
Compliance Control Framework	Riverside Scotland has developed a risk-based compliance control framework and monitoring programme to confirm our objectives are consistently met and continue to be met.
Competence framework	Riverside Scotland will ensure that any person or organisation appointed to undertake any compliance related activity is competent.

The Associations Head of Service Delivery will work in partnership with the TRGs Director of Building Safety and relevant Heads of Compliance and the Head of Health and Safety and Environment to ensure the principles of TRGs strategic framework are applied by Riverside Scotland and that outcomes and service standards are consistent.

#### 5. Key Policy Objectives

Riverside Scotland will:

1. Adhere to TRGs strategic risk assessment and define relevant control measures and assurance as it applies to Riverside Scotland.

2. Adhere to TRGs overarching Compliance Framework which will define our strategic priorities and implement a Compliance Management Model which will reduce any risks to a tolerable level.
3. Work with TRG to review existing policies and practices on an ongoing basis, and develop new policies, operational management plans and procedures which are proportionate and applicable to Riverside Scotland, and which are aligned to our risk assessment areas.
4. Introduce effective risk reduction strategies.
5. Work with TRG to develop effective ICT systems and processes, which are proportionate and applicable to Riverside Scotland, to ensure accurate recording and reporting of compliance based activities.
6. Ensure that effective contract procurement and monitoring processes are in place for all work streams we are engaged with in relation to compliance activity to monitor performance and promote continuous improvement.

## 6. Key Principles

### ***Asset Compliance Management Model***

Riverside Scotland as a subsidiary of TRG has adopted TRGs Asset Compliance Management Model, which aims to prevent incidents through a Risk Management process. This is achieved by the identification, assessment and prioritisation of risks, followed by the suitable application of resources to minimise, monitor and control the probability and or impact of unfortunate events. Riverside Scotland will follow the Compliance Management Model below which centres on five core areas:



We have carried out a suitable and sufficient assessment of the asset risks to which employees are exposed while at work; and the risks to people not in our employment arising from the conduct of our undertakings and identified the key risk areas as follows:

Risk Item 1 – Heating and Ventilation (including Gas Safety)

Risk Item 2 – Fire Safety (including FRA)

Risk Item 3 – Electrical Safety (including EICR)

Risk Item 4 – Asbestos Management

Risk Item 5 – Water hygiene (including Legionella)

## Risk Item 6 – Mechanical & Lifting Equipment

This Policy will be supported by specific health & safety related policies and procedures for each key risk area.

We have analysed and evaluated all our key risks through a risk assessment. Details of the main risks are contained within the specific risk policies

The hierarchy responsibility for each key risk is defined in the risk policies.

### ***Risk Management***

The Riverside Scotland Business Plan reflects that Asset Compliance Management is a key landlord responsibility. With regard to this, Riverside Scotland will seek to mitigate against business risk through managing Asset Compliance Management in an efficient, effective and economic manner.

## **7. Policy Implementation**

For each risk area we define the following roles and accountabilities:

- Duty Holder – The person with overall responsibility within the organisation for the implementation of policy and ensuring that adequate resources are made available to enable the objectives of the policy to be met.
- Responsible Person – This is the person in control of operational delivery.
- Competent Persons – Individuals and companies appointed to implement control measures.
- Appointed persons – Individuals and companies appointed to undertake compliance related tasks or activities.

The accountabilities within Riverside Scotland for implementation of this policy are as set out below:

1. Riverside Scotland's Managing Director retains overall accountability for the implementation of this policy and is the named Duty-holder.
2. Riverside Scotland's Head of Service Delivery in direct liaison with TRG's Executive Director of Asset Services is responsible for overall policy implementation, ensuring that adequate resources are made available to enable the objectives of the policy to be met.
3. Riverside Scotland's Head of Service Delivery in direct liaison with TRG's Director of Building Safety and relevant Head of Compliance is responsible for the delivery of key policy objectives as set out herein, including designing and implementing procedures, staff training, and communication to customers.
4. Riverside Scotland's Head of Service Delivery in direct liaison with TRG's Director of Asset Services and Delivery is responsible for operational delivery, including the management of all contractors carrying out compliance related works. Also for the

updating of compliance registers as appropriate and achieving the targets associated with the key policy objectives.

5. Neighbourhood Services and frontline staff shall support Asset Management and contractor teams in gaining access to carry out compliance related work.
6. Riverside Scotland's Head of Service Delivery in direct liaison with the Head of Health, Safety and Environment is responsible for ensuring the policy is kept up to date with prevailing legislation and statutory obligations.

## **7. Resources**

The Association will seek to ensure adequate resources are available to undertake all required statutory inspections and implement any control measures to reduce risks to a reasonable practicable level. As part of the annual setting of the budget, the forward development programme for Asset Compliance Management will be considered and any functions associated with implementing the Compliance Management Model will be considered and assessed for budgetary implications.

## **8. Training**

This policy and the individual risk area policies outlined in Appendices 1-6 will be the subject of a mixed platform of training across TRG and Riverside Scotland and will include all stakeholders. This training will include:

- Team Briefings – for those who need to be aware of but not actively involved in the delivery.
- On the Job training – for those who need to use the procedures in their daily roles.
- Regular Tool Box refreshers – for those using the procedures.
- Academic Qualifications – for appointed competent persons.

We will undertake a competence assessment of each appointed person under the risk area policies and ensure suitable and sufficient training is provided and kept up to date in order to maintain competency levels. The competency of external contractors will be ensured through our procurement processes and ongoing contract monitoring.

## **9. Performance Management Monitoring and Reporting**

TRGs Business Intelligence Team will produce reports in relation to the agreed Key Performance Indicators for all areas of asset compliance. This information will be reported to the Managing Director and Board and monitored as detailed in each individual risk area policy.

This Compliance Management policy will be reviewed in line with TRGs wider compliance strategy and framework. Any review resulting in material changes to

compliance policy and practice implemented by Riverside Scotland will be brought to Riverside Scotland Board for approval.

