

radon management policy

December 2024

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1. Policy statement

believe housing is committed to providing a safe environment for its employees, customers, visitors, and contractors. Part of this safety responsibility is to manage the risks associated with radon gas. We recognise our obligations in relation to radon and will operate in accordance with all current regulatory requirements.

believe housing will work closely with our customers to provide advice and guidance on radon testing, and mitigation, and act upon any concerns raised by customers, colleagues and contractors.

2. Obligations and policy aims

Radon is a natural, colourless and odourless gas. It is formed by the radioactive decay of small amounts of uranium that naturally occur in all rocks and soils.

If left unmanaged this radioactive gas can build-up inside properties causing a potential risk to health by damaging lung tissue, and over a long period may cause lung cancer.

Radon levels vary due to the areas geology and day to day building use. The aim of this policy is to provide a radon testing and mitigation programme to identify and reduce the risk in line with prescribed target levels.

We understand our legal and moral obligations and will ensure that the risk from radon is managed in accordance with current legislations and guidance. This includes but is not limited to:

- Housing Act 2004
- Ionising Radiation Regulations 2017
- Housing Health and Safety Rating system.
- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- The Building Regulations (Approved Document C) 2010
- Construction (Design and Management) Regulations 2015
- Control of Substances Hazardous to Health Regulations 2002.

We must also ensure we comply with the Regulator for Social Housing's regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy.

Under the Housing Act's Health and Safety Rating System (HHSRS) believe housing has a legal obligation to:

- assess risks associated with radon gas in our properties
- where the elevated levels of radon gas are identified, take appropriate action to mitigate the reduce this to a safe level.

The Building Regulations (Approved Document C) 2010 also require that where significant alterations are made to buildings or new buildings are constructed in high radon areas, protective measures are taken to eliminate the build-up of radon gas.

We acknowledge and accept our responsibilities under this legislation and will protect those persons potentially exposed to radon as far as is reasonably practicable, using appropriate control measures.

To ensure we are able to fulfil our responsibilities in relation to the management of radon we will:

- clearly define the responsibilities of believe housing to our customers, colleagues, visitors, and contractors
- provide suitable and sufficient and resource to manage radon gas effectively
- implement suitable and sufficient governance arrangements to manage the risks associated with radon gas
- allocate responsibilities and duties in relation to radon
- employ competent persons to manage radon programmes
- conduct radon testing, where required, within suitable timeframes
- install suitable mitigation to reduce radon levels where testing shows that they exceed the action threshold
- implement effective radon management record keeping
- operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts are in place, conducting client-led performance meetings and ensuring the contractors employee and public liability insurances are up to date on an annual basis
- engage with customers to inform and promote radon awareness
- use the legal remedies available within the terms of the tenancy or lease agreement should any customer, leaseholder or shared owner refuse access to conduct essential radon related inspection and remediation works. Conduct and maintain a risk and control self-assessment for radon management and operations setting out our key risks from radon and appropriate mitigations.

3. Scope

This radon policy applies to all believe housing employees, customers, and contractors who may work, occupy, or use the premises under the control of believe housing. This relates to all properties owned and managed by believe housing. This includes:

- Housing Plus Units
- Offices
- General needs homes.

4. Roles and responsibilities

As a landlord believe housing has a responsibility under the Housing Act 2004 to provide our customers with safe homes, that are free from hazards. As an employer we also have a duty to provide a safe working environment to our employees under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.

The Chief Executive will have overall responsibility for this policy, and delegates day-to-day management of these duties through the Director of Assets and Compliance, to the Compliance Manager.

Radon management is a collective organisational responsibility and therefore this policies implementation is delegated throughout the business as follows:

Audit Committee and Board will:

- challenge internal radon procedures and performance.

The **Chief Executive** will:

- scrutinise the implementation of the radon policy and its related procedure
- provide sufficient resource for the implementation of a robust and compliant system of radon management, in line with relevant legislation.

The **Assets and Compliance Directorate** will:

- promote awareness of this radon policy and its associated procedure, across the organisation and oversee the management of the radon, ensuring that believe housing remains compliant with relevant legislation and guidance
- develop clear and robust customer communication
- regularly report radon programme performance an agreed consistent basis
- develop, maintain, and regularly review the radon procedure
- develop and implement a radon testing strategy across believe housing's geographic area
- procure and oversee performance management of a competent contractor to undertake radon testing and mitigation work

- arrange for mitigation work to be completed in a timely and efficient manner, when testing shows this is required
- where required, arrange for the cyclical inspection and maintenance of radon mitigation installations (such as fans, pumps)
- liaise with managers and other employees of believe housing on matters relating to radon control and provide support and ongoing advice across the organisation
- ensure relevant radon data is recorded, updated, monitored, and held in an appropriate location.

The **Property Repairs Directorate** will:

- ensure that in house teams and contractors working on radon remediation systems they are appropriately trained to do so.

The **Neighbourhoods and Customer Experience Directorate** will

- where required, provide customers with information on radon, including any costs associated with mitigation measures installed, at the beginning of their tenancy and make them aware of their radon related obligations in their tenancy agreement
- support in cases of no access in relation to the inspection and remediation requirements of this policy.

The **Development Directorate** will

- ensure all new build developments are compliant with the relevant radon control legislation and guidance.

The **Corporate Strategy and Assurance Directorate** will

- provide competent health and safety advice as stipulated in regulation 7 of the Management of Health and Safety at Work Regulations 1999
- investigate accidents and incidents involving radon with a view to highlighting opportunities for improvement.

All **believe housing colleagues** will.

- ensure they are aware of the radon management policy and procedure and their duties within these
- immediately report any radon related issues to both the Compliance and Health and Safety Teams.

All customers will:

- follow the guidance supplied around radon safety in their home
- report any faults/defects in the radon mitigation measures which are installed
- advise believe housing in change of circumstances that may affect the radon measurement within their home.

5. Programme and remedial works

We will build our radon testing programme using the information provided in the UK Health Security Agency's radon map. This assigns areas of the UK a percentage radon potential score and allows believe housing to target testing to higher risk areas initially. believe housing does not have any properties which sit in a radon affected area above 10%.

Two detectors will be placed in each property for a minimum testing period of three months. Detectors will be collected and sent to an appropriate laboratory for analysis. The UK Health Security Agency define the action threshold for radon levels in homes as 200Bq/m³ or above. Where a result of less than 200Bq/m³ is confirmed, no further action will be taken, however if the result is more than 200Bq/m³ the following mitigation measures will be installed:

| Result (in Bq/m ³) | Action taken |
|--------------------------------|---|
| 200-299 | Passive ventilation system |
| 300-800 | Active ventilation system |
| Above 800 | Active ventilation system (high rated pump) |

Following the installation of mitigation measures the property will be retested to confirm that the radon level has been sufficiently reduced.

Active ventilation systems will be serviced one year after installation and every two years thereafter by a competent contractor.

Properties in 3-10% radon potential bands, or those in 1-3% with mitigation measures installed, will be retested after any change of tenancy or significant alteration, such as a large extension.

6. Data and records

We maintain a core asset register of all properties we own and manage in our asset management system. This data has been compared to the information in the UK Radon map to confirm the believe housing properties that are potentially affected and build our radon testing programme.

All radon testing programmes are managed through appropriate software, and paperwork, such as mitigation installation information and lab testing certificates is also transferred to our document management system.

7. Competent persons

Only competent contractors will be used to complete radon related activities. Contractors undertaking this work on our behalf will be a member of the UK Radon Association or the European Radon Association.

When testing is completed radon detectors will be sent for analysis at a laboratory operating under the UK Health and Security Agency validation scheme. This scheme ensures good laboratory practices giving assurance on the quality of results being received.

8. Our commitments to our customers

We consider good communication essential in effective radon management, therefore we will develop a customer engagement plan. This will support customers in their understanding of radon and advise them how they can keep themselves and others safe and encourage them to report any concerns.

We also aim to engage with vulnerable and hard to reach customers. We will share information clearly and transparently and will ensure that information is available to customers through regular publications and information on our website.

believe housing will:

- implement a suitable radon detection programme across our homes
- install radon mitigation measures where the radon level detected is above the action threshold
- maintain any radon mitigation measures to ensure they remain effective
- regularly promote radon awareness with our customers
- advise customers of the results of radon testing undertaken within their homes, including providing specific information and assurance if increased radon levels are detected
- keep customers updated on any radon mitigation works taking place
- act upon any radon safety concerns reported by our customers
- consider any suggestions made by our customers that could improve radon control
- liaise with our customers regularly to discuss radon safety precautions and other compliance matters.

9. Performance reporting

We will report to the following in relation to radon management:

| Report recipient | Frequency |
|------------------------|-------------|
| Audit Committee | Quarterly |
| Senior Management Team | Fortnightly |

The content of these report differs however overall, the following will be reported annually:

Data

- Number of properties where radon testing has been conducted
- Number of programmed properties where radon testing is outstanding, including where detectors have been placed but are still within their three-month testing period
- Number of mitigation installations completed
- Number of mitigation installations outstanding
- Information on no access.

Narrative

- Current position
- Narrative in relation to properties where radon testing is outstanding
- Details of radon levels where mitigation installations are required.

10. Quality assurance

We internally review 100% of radon testing certificates receive to ensure consistent quality.

All mitigation installations requiring electrical work are reviewed and signed off by believe housing's Electrical Team.

11. Policy review

The policy will be reviewed every two years unless there is:

- a significant radon incident
- an important change in circumstances or legislation, which would warrant a review being carried out at an earlier date

- any significant issues raised regarding the policy, by an independent organisation undertaking audit or review.

12. Significant non-compliance and escalation

Our definition of a significant non-compliance is any incident which has the potential to result in a major breach in legislation or regulatory standard, or which causes a risk to health or safety, and which needs to be managed as an exception to routine processes and procedures.

All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident or of a colleague becoming aware.

Any non-compliance issues at an operational level will be formally reported to the Compliance Manager and, where necessary, the Health and Safety Manager in the first instance, who will agree an appropriate course of corrective action.

In cases of serious non-compliance, the Senior Management Team and Board would consider whether it is appropriate to disclose the issue to the Regulator for Social Housing as required by the regulatory framework, or any other organisations such as the Health and Safety Executive.

13. Links to other policies and procedures

This policy should be read and reviewed in conjunction with:

- The Radon Procedure
- The Health and Safety policy
- Repairs and Maintenance Policy
- Future Homes Strategy
- Assured (shorthold) Tenancy Agreement
- Tenancy Policy
- Tenancy Management Toolkit
- Equality, Diversity and Inclusion Policy.