Housing Management and Almshouses Sub-Committee 17 April 2024 Housing Compliance Policies APPENDIX 5

Housing User Board (HUB) Comments

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I have read all the documents. They are all clear and easy to read for a literate reader.	
Thank you for the asbestos and electrical safety draft documents. I seemed to recall many years ago, when I lived at [address], that I did have to have asbestos removed from my bedroom, so it is most welcome that you are acknowledging these issues. I assume that where I now live has already been checked for asbestos? Perhaps you should also consider, if not already undertaken, that the issue of reinforced autoclaved aerated concrete (RAAC) should also be fully investigated. With regard to your electrical safety draft document, I cannot recall ever having an electrical safety inspection undertaken by the City of London. You mention doing these every five years, so this needs explaining Asbestos management policy - I have read policy and it seems to be clear and detailed.	 We can confirm that we have asbestos data for this property Regarding RAAC, we have completed the desktop analysis of our housing portfolio and undertaken the requisite visual inspections. There is no evidence from the visual inspections that RAAC was used in the construction of the Corporation's housing stock. The electrical safety inspection query has been referred to the Property Services Team and a response will be provided to the resident
policy and it seems to be clear and detailed.	
Asbestos	Asbestos
Point 4. Licenced contractors - The HSE only allows certain works on ACM to be carried out by contractors. Should this be 'licensed contractors'? Refurbishment and Demolition surveys – A survey required before any work is carried out which cannot be undertaken using controlled measures and is used to determine the extent and scope of any asbestos removal or remediation works required before works. Don't really understand this	 Point 4 – this has been amended Refurbishment and Demolition survey - agreed, the definition could be clearer. This has been amended to "A more detailed survey required before any work is carried out and asbestos materials are likely to be disturbed as part of a refurbishment or demolition project." Point 6 – this has been amended
6. We will aim to achieve this policy by: - identifying ACM within their buildings. Where it is not reasonably practicable	

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Should 'their' be 'our'?

Lifts

10. Repairs and Maintenance City of London Property Services will carry out any reported repair requirements in accordance with the Repairs and Maintenance Policy. All works will be undertaken by people competent to do so.

What does 'competent' cover?

12. Resident Commissioned Works The Housing Division will maintain a consent process for any resident commissioned works that involve lifting equipment in accordance with the Alterations Policy. Approval will not be unreasonably withheld, although consent may be refused or conditions imposed where appropriate. Conditions may include a requirement for the resident to commission appropriate maintenance and inspection activity. Where unauthorised work with the potential to impact safety is discovered. We will take the appropriate action to remove or remedy. The cost of doing so may be recovered from the resident.

Does this refer to lifts in homes?

22. Exceptions

We may make an exception to the approach outlined in this policy if the circumstances require it and it is reasonable to do so. Our reasoning can be provided to the affected parties on request.

Seems a bit vague – who is potentially affected? Who are the parties?

Lifts

- Point 10. Thank you and amended to "competent and qualified to do so", as works will only be carried out by accredited contractors as outlined in section 17, training.
- Point 12. This refers to the rare occasions on which residents are carrying out authorised works in their property and require lifting equipment to be on site i.e. a fork lift to transfer heavy materials.

This also covers instances where a resident may have installed lifting equipment i.e. a stairlift, that has been deemed as unsafe by a City of London representative.

 Point 22 – this is a standard part of our policy documents, which makes clear that we can depart from usual policy rules if the circumstances demand it, and it is reasonable to do so. This is to avoid fettering our discretion and being overly rigid in our application of the policy, which could theoretically lead to legal challenge (which could happen in the case of some policies but is unlikely here).

The 'relevant parties' are most likely to be residents.