

Blackfriars Hall Accommodation Health and Safety Policy

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Contents

- Introduction..... 4
- The Legislative Environment..... 5
 - The Housing Health and Safety Ratings System 5
 - Licensing Under Part II of the Housing Act 2004..... 5
 - Local Government Regulation (formerly LACORS) Housing - Fire Safety Guidance on fire safety provisions for certain types of existing housing..... 6
 - The Building Safety Act 2022 6
- Framework for the Health and Safety Policy 6
- Gas Safety..... 6
- Electrical Safety..... 8
- Fire Safety 11
 - Risk Assessment - The Regulatory Reform (Fire Safety) Order 2005..... 11
 - Fire Safety and Precautions 12
 - Fire Detection Systems 14
 - Mixed Use Developments..... 14
 - Testing Regimes 15
 - Emergency Lighting..... 15
 - Disabled Refuge Systems 16
 - Soft Furnishings 16
 - Tenant Education 16
- Security 18
- First Aid and Emergency Procedures 21
- Lifts..... 21
- Windows..... 23
- Window safety 23
- Control of Substances Hazardous to Health (CoSHH) 24
- Legionnaires Disease 24
- Asbestos Policy 26
- Energy Performance Certification 27
- Smoking and the Health Act 2006..... 28
- Property Inspections 29
- Housing Act 2004 - Risk Based Assessment and Licensing 30
 - Housing Act 2004 Part II..... 30
- Construction (Design and Management) Regulations 2015..... 31
- Housing Students with Physical Disability 32
- Insurance Cover 33

Emergency, Disaster and Incident plan	33
APPENDIX A - Schedules.....	34
1. Schedule of Planned Preventative Maintenance (PPM).....	34
2. Lift locations and maintenance	35
3. Blackfriars Hall properties with common areas:	35
4. Sites with Centralised water systems	35
APPENDIX B - Health and Safety Responsibilities of Key Staff	36
Overview.....	36
The Regent.....	36
Vice Regent.....	36
The Bursar	36
The Bursary Team	38
Accounts & Accommodation Officer.....	39

Introduction

This health and safety policy applies to all of Blackfriars Hall's accommodation. This includes all dwellings owned, leased or managed by Blackfriars Hall. This policy sets out the policies of the Hall under the Health and Safety Policy of its parent charity, the English Province of the Order of Preachers.

Blackfriars Hall operates modest accommodation in central Oxford for 22 licensed residents under the Universities UK Accommodation Code of Practice (ACOP). Our residents include postdoctoral students of the University of Oxford and Visiting Students, who are primarily undergraduates studying at universities outside of the UK.

Blackfriars Hall has three properties within its portfolio, including two shared houses (16-17 St John St) and a flat at 33 St Giles.

Part of this policy relates to legislative compliance and its interpretation, other parts relate to matters that exceed the legislative minimum. In line with current legislative and policy development Blackfriars Hall's approach to Health and Safety (whilst maintaining its statutory legal obligations) relies on a risk based health and safety and seeks, wherever possible, to minimise those risks within the bounds of practicability.

Within health and safety routines, emphasis has been placed on the integration of certain core routines into the property inspections carried out by dedicated housing management staff.

The Legislative Environment

There are a number of important sources that Blackfriars Hall uses to determine the legislative environment within which it works in respect of health and safety, which are:

The Housing Health and Safety Ratings System

The condition of all housing is subject to Part 1 of the Housing Act 2004 and the evidence based risk assessment process of the Housing Health and Safety Rating System (HHSRS), on which local authorities now base enforcement decisions. This applies to all types of residential premises, whether or not any amenities are shared.

HHSRS risk assesses twenty-nine categories of housing hazard. Technical assessment is a two-stage process, addressing first the likelihood of an occurrence and then the range of probable harm outcomes. These two factors are combined using a standard method to give a score in respect of each hazard.

HHSRS does not provide a single score for the dwelling as a whole or, in the case of multiply occupied dwellings, for the building as a whole. Hazards are scored in bands, from band A, the most severe, to band J. Category 1 hazards are those rated in bands A-C. Category 2 hazards are those rated band D and lower. Category 1 hazards trigger a local authority's duty under section 5 of the Act to take the appropriate enforcement action.

There is no legislative or regulatory requirement to undertake this additional assessment.

Currently, Blackfriars Hall has no category 1 hazards and it is unlikely that any can occur. HHSRS will continue to be used where a new property has been acquired or brought into management or where sufficient changes are made to a building to warrant a further assessment.

Internal staff training is enhanced and refreshed annually, so that any Category 1 hazard that may occur can be dealt with through the housing management system.

Licensing Under Part II of the Housing Act 2004

Standards in respect of management, amenity level and health and safety matters are required when houses in multiple occupation require a licence. The definition of house in multiple occupation (HMO) is contained in section 254 of the Housing Act 2004. The definition is complex, and for detailed understanding then the Act itself should be studied. For Blackfriars Hall's purposes, however, the key definition of an HMO is that the living accommodation is occupied by persons who do not form a single household.

The categories of HMO which fall within mandatory licensing are prescribed in The Licensing of Houses in Multiple Occupation (Prescribed Descriptions) (England) Order 2006. These are all HMOs comprising three storeys or more and occupied by five or more persons living in two or more separate households. With effect from 1 October 2018 mandatory licensing of HMOs was extended so that smaller properties used as HMOs in England which house 5 people or more in 2 or more separate households need to be licensed. Licensing was also extended to purpose built accommodation where the building was converted from a previous use.

In addition to the mandatory and additional HMO licensing, in Oxford, selective licensing has been introduced. Through these selective licensing schemes, landlords with privately rented properties in defined areas will need to obtain a license in order to be able to rent out their property.

Whilst shared houses fall within the legal definition of an HMO and are licensable, it is recognised that they can often present a lower fire risk than traditional bedsit-type HMOs due to their characteristics.

Blackfriars Hall lets individual rooms in houses and flats under the Universities UK Accommodation Code of Practice (ACOP).

Local Government Regulation (formerly LACORS) Housing - Fire Safety Guidance on fire safety provisions for certain types of existing housing

Fire safety within the home is an extremely important issue, especially in mixed use premises and where unrelated occupiers, who live independently from one another, share common areas of the same building. This area of law is covered by both the Housing Act 2004 and the Regulatory Reform (Fire Safety) Order 2005.

This guidance helps to manage the relationship between the Housing Act 2004 and the Fire Safety Order by offering advice and assistance to enforcers, landlords, managing agents and tenants, amongst others, on ways to make residential buildings safe from fire, regardless of which piece of legislation is relevant.

At its core, this guidance also relies on carrying out a fire risk assessment to ensure that a property has adequate and appropriate fire safety measures in place.

The guidance also takes into account the impact of the Regulatory Reform (Fire Safety) Order 2005 which imposes a legal obligation to carry out a formal risk assessment of the common parts of a property when the property is let on a shared occupancy basis.

The guidance applies to all types of property except (in respect of Blackfriars Hall's portfolio) purpose built halls of residence and properties or those dwellings constructed or converted to a standard in compliance with the Building Regulations 1991 or later.

The Building Safety Act 2022

Blackfriars Hall is not currently responsible for any high-rise residential building that will be subject to the forthcoming regulations and would require registering with the Health and Safety Executive.

Framework for the Health and Safety Policy

A risk based approach to health and safety is taken to each individual property. That risk assessment, however, falls within various categories reliant upon the type of property and the nature of its occupation.

Gas Safety

The annual testing and approving of all gas appliances and installations (cookers, gas heaters, gas fires, hot water and heating boilers, and associated pipe work) is set out within a regulatory framework. All properties are tested annually for gas safety purposes in accordance with the Gas Safety (Installation and Use) Regulations 1998 (GSIUR) as amended.

Following satisfactory inspection, the pass certificates are returned to Blackfriars Hall where they are kept on file by property and displayed by each appliance. Gas servicing is generally carried out in summer and autumn.

Each gas safety certificate is completed and signed by a Gas Safe registered engineer and the certificate displays the Gas Safe Register logo and registration number of the engineer clearly.

Certification details are logged centrally to ensure that all relevant properties comply with these requirements.

Gas safety is further increased by Blackfriars Hall using condenser boilers rather than separate water and space heating. This reduction in the number of gas appliances provided within a property automatically reduces the risk of a fault occurring.

Gas Cookers and Flame Supervision Devices (FSDs)

Following guidance effected from 1st January 2008 all gas cookers have to be fitted with FSDs in flats or multiply occupied buildings. Blackfriars does not currently supply gas cookers in its housing.

When fitting a new appliance requiring a new electrical supply it fits a dedicated power socket for that electrical supply, normally behind or adjacent to the cooker. Existing power sockets fitted above a work surface are not used to stop trailing cables running close to working surfaces.

Blackfriars Hall maintains a database of all electrical appliances in its portfolio.

Carbon Monoxide Detection

Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022 requires the provision of a carbon monoxide alarm in any room used as living accommodation which contains a fixed combustion appliance (excluding gas cookers) by 1st October 2022. Faulty alarms are replaced as soon as reasonably practicable when they are found to be faulty.

Electrical Safety

Many of the relevant regulations dealing with electrical safety and installation refer to "*a Competent Person*" and this means, an electrician that has been approved by a government-approved scheme as sufficiently competent to self-certify that its work complies with the Building Regulations Part P (Design and Installation of electrical installations) and is designed, installed, inspected and tested to the standard required British Standard.

The predominant regulations affecting electrical safety and standards are the current Institution for Electrical Engineers Wiring Regulations, the current British Standard, the Electricity at Work Regulations 1989 and the Health & Safety at Work Act 1974. Electrical testing has to be carried out by a Part 'P' registered Competent Person.

There is a statutory requirement that all HMOs (both licensable and not licensable) must have their mains installation inspected every five years, by a person qualified to undertake such inspection and testing and a certificate provided by that person specifying the results of the test. The standards set for non HMO rented accommodation are recommendations only and the Health & Safety at Work Act deals solely with obligations for employees with some effect on residential accommodation where employment liabilities are incurred.

Testing complies with Electrical Safety Standards in the Private Rented sector (England) Regulations which came in to force on 1 June 2020 which requires that landlords have property electrics checked at least every 5 years by a qualified and competent person. Tenants are provided with the most recent copy of the electrical report on the Blackfriars Hall Tenant's Portal and the record is kept centrally.

Blackfriars Hall ensures that electrical safety within its property portfolio is maintained in a number of ways:

- a) All *new electrical installations* are certified as safe by a professionally competent electrician, preferably one that is registered with NICEIC. An Electrical Installation Certificate (compliant with the British Standard) is handed over by the contractor or developer for property and landlord supply within 12 weeks of the building being completed. In a development partnership Blackfriars Hall includes legally binding clauses that if certificates to the required standard are not received within the 12 week time frame then Blackfriars Hall will commission its own certification at the expense of that partner.
- b) For *existing installations* a periodic electrical testing and inspection regime is carried out for each dwelling and landlord supply. A report is issued by a professionally competent electrician which provides an overall summary of the electrical fixed wiring system's compliance with relevant regulations and an assessment that the installation is satisfactory and, if unsatisfactory, outlines what work is required.
- c) *Minor Works* take place frequently within the portfolio. Following certain minor alterations or additions to existing electrical wiring systems within the property portfolio a Minor Works Certificate to the British Standard is obtained and recorded.

Minor Works Certificates are not obtained for every adjustment or replacement made as part of an existing electrical installation and these are checked within the periodic inspections routine outlined. Examples of work where a Minor Works Certificate is not required are:

- replacing accessories such as socket-outlets, control switches and ceiling roses
- replacing the cable for a single circuit only, where damaged, for example, by fire, rodent or impact
- re-fixing or replacing the enclosures of existing installation components
- providing mechanical protection to existing fixed installations
- installing or upgrading main or supplementary equipotential bonding
- work that is not in a kitchen or special location and does not involve a special installation and consists of adding lighting points (light fittings and switches) to an existing circuit. adding socket-outlets and fused spurs to an existing ring or radial circuit.

Minor Works Certificates are obtained where more substantial electrical additions and adjustments have taken place and where Part P to the Building Regulations 2005 applies. Examples of works where Blackfriars Hall will require a Minor Works Certificate would be:

- alterations made in "wet" area (kitchens and bathrooms)
- fitting of new (but not replacement) extractor fans in wet areas
- wiring connected to installation of new central heating boilers
- significant changes to the installation.

d) Blackfriars Hall also *assesses electrical safety* as part of carrying out its *housing management inspection routine*. Inspections normally occur at least twice during each academic year as tenancies are concluding. Staff use the inspections to check the following:

- visual evidence of cracking, damage, scorching to socket outlets and switches
- visual evidence of damage to light fittings and free standing lamps
- visual evidence of over occupants over-loading the power outlets
- evidence of unsafe practices by tenants

Results from these inspections are noted and any electrical repair work required is commissioned from a competent electrician. Certification is required in accordance with this policy.

e) The 18th Edition of the IEE Wiring Regulations) came into effect on the January 2019. All new commercial, domestic and industrial wiring installations after that date must be designed, constructed, inspected, tested and certificated to meet the requirements of the current British Standard. In some cases, where certain alterations are made to an electrical installation, that installation may need upgrading to meet the 18th Edition standard.

RCD on power circuits trip out when an unsafe appliance or a fault on a circuit occurs and are fully re-settable once the problem has been resolved. These consumer units protect against serious damage from electric shocks from all appliances used in the property, including the majority of those appliances which belong to tenants.

Portable Appliance Testing (PAT)

Blackfriars Hall undertakes PAT testing of all equipment it provides, and certification details are logged to ensure that all relevant properties comply with these requirements. The Hall has a separate PAT Policy that is communicated to residents.

Visual checks on all electrical appliances are undertaken by Bursary staff as part of their inspection routine. Where an appliance looks to be unsafe, then tenants will be written to advising them to remove certain appliances from the property that might constitute a hazard.

Light Drops and Bulbs

Specialist lamps and lamps located within fittings are replaced, on request, by Blackfriars staff and appointed contractors. Where tenants are responsible for bulb replacement, light drops have been lowered to allow for ease of access.

Periodic checks are made, as part of the Hall's inspection routine, of communal areas, corridors, stairwells where bulb replacement is the responsibility of Blackfriars Hall. In communal areas illumination is provided at regular intervals so that a single lamp failing does not constitute a hazard. Where possible, Blackfriars Hall uses LED and low energy lamps.

Components and Appliances

All appliances are installed in accordance with the manufacturers' instructions and function in accordance with manufacturers' operational limits and are capable of being operated in a safe manner. Appliances are regularly visually inspected for wear and tear and any defects remedied

Blackfriars Hall does not purchase reconditioned or second hand appliances, although appliances can be relocated within the portfolio for reuse. When replacing fridge/freezers those appliances meet the A or B rating on the Energy Label system which primarily shows energy efficiency.

Instruction for the safe use of all electrical appliances provided by Blackfriars Hall are made available at www.Blackfriars Hallhousing.org.uk. In some cases, where necessary 'point of information' instructions provided next to appliances or heating systems.

Fire Safety

The current standards Blackfriars Hall uses for its properties are based on *Local Government Regulation (LGR) Housing - Fire Safety Guidance on fire safety provisions for certain types of existing housing* which covers obligations under both the Housing Act 2004 and the Regulatory Reform (Fire Safety) Order 2005.

This guidance does not apply to student halls of residence and the standards Blackfriars Hall uses for these buildings are based on specific advice received from the Fire and Rescue Services as part of previous audits, the requirements of the Regulatory Reform (Fire Safety) Order 2005 and the detailed fire safety guidance contained in the *HM Government Fire Safety Risk Assessment Sleeping Accommodation Guide*.

In all cases the guidance is interpreted locally by the local Fire and Rescue Service and City Council under a protocol which allocates responsibilities for fire safety between them.

Risk Assessment - The Regulatory Reform (Fire Safety) Order 2005

This regime of fire safety enforcement came into force on 1st October 2006 and affects employers and those who are responsible for non-domestic, industrial, commercial and residential premises.

The Regulatory Reform (Fire Safety) Order 2005 (also known as the RRO) makes it necessary, in certain circumstances, to carry out a specific risk assessment for fire risk. In the case of buildings covered by the LGR Guidance it is not necessary to carry out a specified risk assessment for domestic properties

Lacors Guidance - The Regulatory Reform (Fire Safety) Order 2005 places duties on housing providers to risk-assess fire safety in their properties, to take adequate precautions to reduce that risk and to manage that risk which remains. The duties apply throughout a range of property types, but in HMOs, flats and maisonettes and sheltered accommodation in which personal care is not provided they apply only within the common areas (although housing providers need to consider the risk created within the private areas too).

For commons parts of a building shared by multiple addresses, risk assessment is always required.

Blackfriars Hall carries out a specified risk assessment:

- on all properties
- on common parts of sub-divided buildings (usually buildings divided in to flats)
- on all larger developments which are regarded as halls of residence. *The Government Approved National Codes of Practice* (issued under Section 233 of the Housing Act 2004) definition of a "larger development" is used which is 15 or more bed spaces.
- for properties managed by Blackfriars Hall under management agreements; this makes provision for such an assessment to be provided by the owner of the building to Blackfriars Hall or empowers Blackfriars Hall to undertake such an assessment, on behalf of the owner.

In properties where there is multiple ownership, the other owner/s of the building are responsible for producing a fire risk assessment and providing Blackfriars Hall with a copy of this and, in turn, Blackfriars Hall will provide a copy of its assessment to them on request.

The purpose of these fire risk assessments are to:

- identify the fire hazards
- reduce the risk of those hazards causing harm to as low as reasonably practicable
- decide what physical fire precautions and management arrangements are necessary to ensure the safety of people in the premises if a fire does start.

Assessments for dispersed and sub-divided off-street properties take the methodology recommended in *Part D* of the LGR Guidance which, in turn, is based on the methodology outlined in the HM Government Fire Safety Risk Assessment Sleeping Accommodation Guide. The risk assessment is recorded in the same format as the *Example form for recording significant findings from the fire assessment in Appendix 3* of the LACors Guidance.

Internal reviews are carried out every six months, as long as there have been no material changes to the property. The review checks the original assessment is still accurate, comments on the completion of action points, and checks how the tenants are occupying the property. The Hall Bursary officers are adequately skilled to carry out a review on this basis.

Risk assessments for all buildings with common parts are reviewed annually by the Blackfriars Hall Bursary.

Fire Safety and Precautions

Current practice regarding student accommodation fire safety centres on compartmentalisation and automatic fire detection together with the minimisation of false alarms. All of the systems deployed through the Blackfriars Hall portfolio meet or exceed the statutory requirements for fire protection.

Overall fire safety within the portfolio is achieved by a combination of detection systems, fire fighting equipment, layout design and tenant education. The integrity of these fire systems is then maintained by a structured testing and monitoring regime.

Any changes to the Fire Plan are drawn to the attention of the local fire authority. Fire detection and fire fighting equipment is provided in line with that recommended by the fire risk assessment.

All properties are provided with fire blankets complying with the current British Standard. These are located in the kitchens of the properties.

Where fire extinguishers are required, they are fitted to the current British Standards. Where tampering may occur, this is followed up in a meeting with the relevant tenant/s, which is possible with the modest resident numbers on site.

Where fire extinguishers are fitted they are serviced annually and certification of such servicing, together with the remedying of any defect is kept on file.

Fire blankets are also inspected annually and a record is documented centrally. If the blanket has been damaged it is discarded, if not, it is refolded, a new tamper tag fitted and reused.

Layout/Fire Integrity

All Blackfriars Hall properties are designed or converted to ensure that the layout and fire integrity of the building is coordinated with the overall fire strategy of the property.

The basis of these strategies is to provide either;

- a safe exit from the property in the event of a fire or
- a safe refuge from fire which will maintain its integrity long enough to allow the fire to burn out or for the automatic detection system to activate so that the fire service can be called to assist.

Compartmentalisation and route of escape

Within HMOs in Blackfriars Hall's own portfolio and managed, each habitable room is given a 30 minute protection. This protection is achieved via standard construction methods and fitting 30 minute fire doors and where smoke detection is fitted in bedrooms these are also fitted with intumescent strips and brushes or 25mm rebates (known collectively as "cold seals"). The integrity of these doors and the smoke sealing must meet the current British Standard.

Self-closers are fitted on all kitchens and living rooms in line with LGR advice or where risk assessment or Building Regulations requires this. Rooms with self-closers are checked as part of the housing management inspection process to ensure that doors are fully closing properly and remedial action is taken where this is not the case.

Within larger buildings additional fire protection is provided. The integrity of each individual flat unit is for either 1 or 2 hours. This compartmental approach includes protecting all ductwork which rises through the building so that fire and smoke cannot spread between floors. These are checked more rigorously in line with the Home Office Guidance

Where the primary means of escape is through a kitchen or lounge area a secondary means of escape is provided through escape windows. If escape windows cannot be fitted then additional protection including sprinkler systems are used.

Fire Detection Systems

All Blackfriars Hall dwellings are covered by a minimum of a mains-wired fire detection system to current British Standard. The type of detection system provided depends upon the type, occupant type and layout of the property. Some example systems are described below but exact systems may differ from property to property.

Mixed Use Developments

There is one development in the Blackfriars Hall portfolio which is described as “mixed use”. Mixed use as defined in the Building Regulations, Part B, is simply a building containing living accommodation together with occupancies other than residential.

In this situation, Blackfriars Hall undertakes a thorough fire risk assessment (taking advice from the fire and rescue authorities before complying as necessary with building regulations for this type of accommodation). Blackfriars Hall does not take responsibility for the testing and maintenance of fire systems out of Blackfriars Hall demise.

Blackfriars Hall ensures that:

- separate entrances are provided to the accommodation
- appropriate measures are taken to ensure that there is both vertical and horizontal fire protection to maintain the integrity of the means of escape in accordance with British Standard
- any automatic fire detection system and alarm system with which the main part of the building is fitted also covers all of the accommodation.
- In the developments currently managed by Blackfriars Hall, this will include a fully addressable fire system to the appropriate British Standard with detection in all risk and common areas together with Emergency Lighting. In a number of developments there is also an automatic smoke extraction system
- any security measures in place will not prevent escape at material times.

Blackfriars Hall will ensure that the testing regime for fire detection and emergency lighting will follow that recommended for the building’s size, as previously described.

Escape from the Property

Where the property is an HMO, all external doors are fitted with a mortise lock with an internal thumb turn or exit button allowing escape from the building without the use of a key.

Testing Regimes

All properties have their fire systems tested annually to comply with British Standards by a contractor is a specialist fire engineer. This involves testing every detector, battery back-ups and the general functioning of the system at least once a year. All certification and tests are recorded centrally on a dedicated Health and Safety system

The testing regime is as follows:

Fire systems are tested twice-yearly.

In addition, a weekly manual test of the call points is carried out on rotation by Blackfriars staff and/or the Clerk of Works to ensure that the system is working correctly. This also allows in-house staff to check that the control panels are not showing any faults. Staff also inspect means of escape on these visits.

Additional Visual Inspections

Bursary staff carry out a number of checks during their property inspections (as outlined in Property Inspections).

Emergency Lighting

Emergency lighting is a self-descriptive term and is lighting for an emergency situation when the main power supply fails. The loss of mains electricity could be the result of a fire or a power cut and the normal lighting supplies fail. In larger buildings the provision of emergency lighting is an integral part of the safety regime of the building and is fitted at the time of construction or conversion.

In other off street properties emergency lighting may be required, particularly in larger HMOs, where a risk assessment identifies that a protected escape route is not provided with adequate background lighting either natural or borrowed from street lighting to ensure the safe movement of occupants to the final exit door(s). In these cases emergency lighting is fitted to address the particular risk identified.

As part of Blackfriars Hall's RRO inspection routines, the need for emergency lighting is identified and revised on a regular basis.

Emergency lighting systems need routinely inspecting and testing in accordance with recommendations made in British Standard and following Lacors guidance (Local Government Regulation).

Daily

Indicators of central power supply visually inspected for correct operation. Does not require a test of operation.

Monthly

- a) A simulation of a failure of supply to ensure all luminaires (lamps & signage) are luminated whilst in emergency mode. The period of simulation should be sufficient for the purpose of this clause, whilst minimising damage.
- b) Check that all luminaries and all lamps are clean, undamaged and the lamps are not blackened.

Annually:

- a) A full rated duration test, in accordance with the manufacturer's guidelines by a competent service engineer.
- b) The supply of normal lighting shall be restored and any indicator lamp or device checked to ensure that it is showing normal supply has been restored.
- c) The charging arrangements should be checked for proper functioning.

d) The date of the test and its results shall be recorded.

See **Appendix A – 2. Schedule of PPM routines**

Dispersed houses with normal risk

Most average sized premises with normal risk: an annual discharge test in accordance with the requirements of British Standards This must be carried out by a competent person, usually a lighting engineer under a maintenance contract. It entails a full rated duration test to ensure compliance with the standard and should be recorded in a log book with a periodic inspection and test certificate issued.

Disabled Refuge Systems

Under current Building Regulations, all new non-domestic buildings with more than one storey provide "refuge" areas. A refuge area is a relatively safe place where a person/people who cannot easily use fire escapes and evacuation lifts can call for assistance and wait until help arrives.

In the event of a fire or emergency, disabled people are evacuated to the Refuge Area, where a remote unit can be activated.

Blackfriars Hall has one development that is equipped with a Refuge System and this incorporates an Emergency Voice Communication system (EVC).

The Refuge System comprises a panel on each landing (outstation) which feeds into an addressable master panel in the office. The lift landings are fire separated from the flats around them, meaning refuge could be taken either within a flat or on the landing. Pressing a button on the outstation sounds an alarm in the office and allows voice communication to a central point on the ground floor lobby.

The system is wired using fireproof cable and has battery backup in accordance with the relevant British Standard. Should batteries fail, the system will give an "unhealthy" warning on the master panel.

Systems are tested for operation as part of the fire detection checks.

Weekly - Function test (of outstations on rotation) is undertaken by Blackfriars Hall staff.

Bi-annual - Full system check is carried out by competent person (under a maintenance contract).

Soft Furnishings

All soft furnishings provided by Blackfriars Hall within its portfolio meet the requirements of the *Furniture and Furnishings (Fire) (Safety) Regulations 1988* (as amended in 1989 & 1993). This legislation covers items such as mattresses, sofas, cushions and seat pads.

Blackfriars Hall is not liable for any items that are non-compliant if they are brought into the property by a tenant or tenants. Where a non-compliant item is suspected (identified as part of a normal property inspection) Blackfriars Hall sends a letter notifying the tenant of any potential danger and makes a strong recommendation that the item should be removed from the dwelling.

Tenant Education

Tenants receive information regarding fire safety in their building in the following ways:

- from a "Fire Instructions" notice placed on the notice board in all student bedrooms in larger developments. From a "Fire Instructions" notice placed next to any fire control panel in off

street properties which contains instructions for operating the panel). This allows tenants to interpret the information being provided and to react appropriately following a simple checklist.

- in their arrival information
- in the relevant tenant/licensee information (either paper based or electronic)
- in a briefing given to all students who attend the kitchen meetings at the start of the year
- from notices displayed in each communal area (e.g., kitchens and common rooms).

The "Fire Instructions" notice gives clear instructions on what to do if the fire alarm sounds, how to report any fault and how to react if a fire is discovered.

The presence of all relevant notices, as detailed above, are checked as part of the housing management inspection process.

Security

Every Blackfriars Hall property is fitted to ensure that suitable security provision is provided for the occupants. It is very important to keep dwellings secure against unauthorised entry thus avoiding fear of a burglary and the stress and anguish that burglary and possible injury can cause.

The level of the security provided varies depending on individual locations and circumstances of each property but the following standards are provided throughout the portfolio:

External Doors

The type of security fitted to external doors varies across the properties because of varying factors of security, fire safety, location, mail delivery and occupancy type. As such it is not possible to categorise as up to a certain standard. However, a number of minimum standards and general considerations are taken into account as listed below:

Door Construction

External doors to all properties are of solid core construction. Where there are glazed sections to the doors, the glazing is either Georgian wired or laminated for increased security. The door frames are strong and well secured to the jambs. If an external door is replaced the full door set will be replaced in line with the current British Standard "doors of enhanced security".

Door Entry Systems

33 St Giles is fitted with a door entry system. This features an intercom at the ground floor of the building with a video feed allowing residents to assess who is requesting access.

All door entry systems operate either a servo operated mechanical latch or electro-magnetically locking door. Where servo operated mechanical latches are used they are of a high security specification. Residents gain access either with a key, a proximity reader which identifies a key fob kept with the residents key or a digital number punch. Tenants receive information about avoiding "tailgating" into buildings by unknown persons.

Letter Plates

Where letter plates are fitted in external doors these comply with current British Standards and are located a minimum of 400mm away from any locks. All letter boxes fitted to HMOs are fitted with restriction devices to prevent access to the locking system internally via the letter aperture.

Wherever mail delivery directly to the property is available, mail is delivered directly to each flat and posed through a letter box in the front door.

Locks

Locking provision requires a balance between providing adequate security but maintaining ease of escape in the event of a fire. In line with the LGR Guidance, where the property is an HMO all external doors are fitted with a mortise lock with an internal thumb turn allowing escape from the building without the use of a key.

In off street HMOs Blackfriars Hall uses five lever mortise locks conforming to British Standard or a euro profile mortise lock with cylinder as a minimum on its external doors where those doors form the principle barrier to access to the building.

In larger buildings Blackfriars Hall uses cylinder operated lock cases which feature a self-latching mechanism with an additional mortise throw bolt. This provides the self-locking facility of a rim 'Yale' type lock with the additional security of a standard mortise lock, all operated via one key and internally releasable by a thumb turn.

All door sets conforming to British Standard are designed with an acceptable level of lock security. If a door set of this type requires replacement locks conforming to British Standard Security Grade 3 (minimum) are used.

In many non HMOs mortise locks with a boxed keep to British Standards are used. These require a key to unlock both internally and externally. Blackfriars Hall's preference (even in low risk buildings) as lock systems are replaced, is to move to locking mechanisms in non HMOs which allows escape from the building without the use of a key.

Internal Lighting

All stairwell and communal areas shared by several separate dwellings are well lit to deter intruders.

External Lighting

Where lighting from adjacent street lighting provides insufficient external illumination, properties within the portfolio are fitted with 'dusk 'til dawn' lighting to enhance security.

To the rear of properties, where a security risk is identified, additional lighting is fitted to deter intruders.

In developments, major thoroughfares are well lit via high power lamps to provide a secure environment for tenants. Where any potentially vulnerable dark areas around the perimeter of sites exist, specific lighting is introduced to reduce the risk of intruders.

Blackfriars Hall inspects all external lighting regularly to address any faults or lamp replacements. Use of CCTV

In general, CCTV is not fitted to off street properties. Mobile CCTV equipment is used where any specific, and normally temporary, problems surface. In larger new developments, CCTV is normally fitted.

See **APPENDIX A – 3. Schedule of CCTV locations**

Garden Maintenance

Wherever possible, sight lines from the adjoining areas to the property are maintained to provide passive surveillance. Garden maintenance ensures hedges are kept trimmed low and trees are pruned so as not to obscure the properties.

Where low maintenance gardens are laid, the use of gravel or stone chippings as loose aggregate around the building perimeter provides a useful audible warning of any intruders on the property.

External Planning

In individual off street properties railings are frequently used to define public/private space for security. Unobserved rear yards are protected with locked railings where necessary while lower railings and gates, simply to delineate the space, are suitable to front elevations where appropriate.

Where external gates are fitted with a lock this is suited to the house main locking system ensuring that a single key fits all locks.

Resident Information

All tenants receive a variety of information about security. This information incorporates sections about personal safety. Safe and Secure posters are displayed in each communal area in large complexes and dispersed properties giving full details of the security provisions of each particular flat.

Personal Possessions Insurance

Blackfriars Hall does not provide personal possessions insurance (via an external insurance company) to all HMO tenants, but does provide all occupants with information about how and where they can obtain such insurance.

Out of Hours Security Centre

Blackfriars Hall cooperates with Oxford University Security Services as an out of hours security centre. OUSS provides dedicated and trained on site staff who currently respond to telephone enquiries outside of Blackfriars Hall office hours. The security centre is also linked to the Blackfriars Emergency Telephone, through which contractors can be raised through contact with Hall staff to attend to emergency repairs and respond to lock-outs.

Blackfriars Hall also employs Junior Deans who are on call on site for security emergencies and who can be contacted by any member of the Blackfriars senior management team (the Moderators). Junior Deans are located in 16 St John St (Room 2) and 17 St John St (Room 2 or Room 3).

First Aid and Emergency Procedures

Blackfriars Hall maintains first aid facilities, based upon an assessment of needs, to ensure that students, staff and members of the public receive timely first aid treatment following an accident resulting in injury or illness requiring first aid intervention.

These facilities include:

- Provisioning of first aid kits and fire blankets in every kitchen of every property.
- All Bursary staff, an appropriate ratio of the Hall Moderators, and both Junior Deans are trained in emergency first aid.

Emergency procedures, protocols, and contact pathways have been established in the Hall's Emergency and Incident Plan for Accommodation to ensure an effective response to emerging situations and facilitate a prompt recovery. Instructions are provided to every resident at induction and on the Blackfriars website. Emergency numbers are posted in every student bedroom and in the front hallway of every property.

Lifts

The Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) contains the requirements for the safe provision and use of lifting equipment. Regulation 9 of LOLER requires that all lifts provided for use in work activities are thoroughly examined by a competent person at regular intervals. In the case of Blackfriars Hall's lifts, all of whom carry people, the requirement is that the lifts are examined at least twice a year.

As the duty holder of the lifts, Blackfriars Hall is legally responsible for ensuring that the lift is safe to use and that it is thoroughly examined. These responsibilities include:

- maintaining the lift so that it is safe to use
- selecting and instructing the competent person;
- ensuring that the lift is examined at statutory intervals (every 6 or months) by a competent person;
- keeping the competent person informed of any changes in the lift operating conditions which may affect the risk assessment
- making relevant documentation available to the competent person, e.g. manufacturer's instructions and maintenance records
- acting promptly to remedy any defects;
- ensuring that all documentation complies with the Regulations
- record keeping.

See **APPENDIX A** *Lift locations and maintenance contracts*

It is important that the thorough examination is sufficiently independent and impartial to allow an objective assessment of the lift to be made. It is therefore important that the same company who performs routine maintenance is *not* used to carry out the thorough examination because they would then be responsible for assessing their own work.

Blackfriars Hall uses an external Company (accreditation by the United Kingdom Accreditation Service to the relevant British Standard) to carry out the twice yearly examination. The examination is carried out in the presence of the Projects Officer, who ensures that such an examination takes place as well as overseeing the maintenance contracts for those lifts.

After each examination a report is produced which is delivered to the Bursary team, who takes action, as directed by the report, and records that action on a report response. It is a legal requirement that reports of thorough examination are kept available for consideration by health and safety inspectors for at least two years. Blackfriars Hall keeps all of its reports to provide a history of each lift's operation in any event and the reports recorded centrally.

It is a condition of Blackfriars Hall's insurers that they receive a copy of the reports and this is undertaken by the Bursar.

Windows

When replacing windows and doors, Blackfriars Hall complies with current thermal performance standards and ensure a certificate is obtained from FENSA or Local Authority Building Control. FENSA enables companies that install replacement windows and doors to self-certify compliance under these Building Regulations without the need for a separate assessment from Building Control.

In order to comply with this obligation, Blackfriars Hall will only use FENSA registered window fitters where window replacement is undertaken. Where full property refurbishment takes place, applications are likely to be made with Building Control and as such FENSA certification is not essential.

The FENSA scheme does not cover the following and work should be notified to the local authority:

- New build dwellings
- New domestic extensions
- Any glazing work in commercial and industrial buildings
- Listed buildings or those in conservation areas
- Doors with less than 50% glazing
- Room conversions e.g. bathroom converted into bedroom, new loft conversions
- Communal areas for flats

For the sake of clarity these requirements are not applicable when repairing existing windows, for example, repairing handles, replacing broken or damaged glazing or fitting or adjusting hinges.

Window safety

Providers of student accommodation have a duty of care to ensure that windows in HMO residences remain safe for users. Window safety includes:

- 1: Preventing falls from windows
- 2: Preventing intruders entering through windows
- 3: Ensuring adequate ventilation to prevent mould
- 4: Preventing objects being dropped from windows potentially injuring passers-by

Blackfriars Hall has installed window restrictors for all student accommodation windows situated at the 1st floor and above. Keys to the key-operated restrictors in 16-17 St John St are held in a red 'break glass' unit for accessibility in case of fire risks.

Control of Substances Hazardous to Health (CoSHH)

Hazardous substances are not limited to commercially available products, but may also be produced as a by-product of a process in the form of mists, dusts and vapours. It is essential that activities involving the use of hazardous products (such as regular household cleaning) or the generation of dusts, mist and vapours that could affect Blackfriars accommodation properties are assessed to determine if they present a risk to health or the environment and, if so what controls are needed to eliminate or reduce those risks to an acceptable standard. The regulations and these principles also apply to biological agents.

It must be assumed that any substance has the potential for impacting on housing residents, whether that effect is beneficial, benign, or damaging. All substances are therefore subject to a risk assessment that will include data supplied by the manufacturer and the means of safe residue or container disposal.

The assessment is made competent person; ideally by the person who decides the substance is necessary. When undertaking assessments, the assessment takes into account that substances may affect some people (e.g. expectant mothers) and not others and may create hazards in some environments where it does not in others. Accordingly, once a CoSHH assessment for a substance has been completed, it is not assumed that this is safe to use in every situation.

Should any substance have properties that have the potential to cause harm, a hierarchy of controls will be employed, as follows –

Control	Comment
Elimination	Stop using the substance or process
Substitution	Use a less hazardous alternative substance
Engineering	Provide local exhaust or dilution ventilation
Administrative Limit	Duration of exposure
Personal Protective equipment (PPE)	Provide gloves, respiratory protective equipment or other person (not a stand-alone control)

Legionnaires Disease

Blackfriars Hall has three buildings with centralised water facilities (cold only):

See **APPENDIX A** *List of all sites with Centralised Water Facilities*.

Blackfriars Hall has a contracted maintenance service to undertake the necessary servicing and cleaning of the water system as stipulated in the Health and Safety Manuals provided for the building by the developers (where available).

Wherever there are tanked water systems it is necessary to take steps to ensure that water is not left standing in parts of the system for any substantial period of time.

Water is run on all hot and cold outlets in any properties (tanked or untanked) that have been empty for a month or more which flushes any stale water through.

The Health and Safety Executive publish an Approved Code of Practice (ACOP) and guidance for *Legionnaires' Disease: The control of legionella bacteria in water systems*. The main part of the Legionnaire's Disease ACOP is a requirement to carry out a two-yearly risk assessment to identify and assess potential sources of exposure to Legionella. This covers all properties, whether large or small. Although the generally high throughput and relatively low volume of water held in smaller water systems reduces the likelihood of the bacteria reaching dangerous concentrations a risk assessment must be carried out. The risk assessments should be reviewed periodically to ensure that any changes to water systems and usage of buildings are taken into account.

Blackfriars Hall undertakes a third party risk assessments at all buildings with tanked systems every

two years.

All significant items noted in those reports for rectification have been actioned.

All other water systems in Blackfriars Hall properties are domestic type systems with a very low risk. *According to the HHSRS v2 the average risk in all domestic dwellings is 1 in 1,423,649 with a very low harm outcome. This compares to fire, for example, which has a risk of 1 in 4,760 with a much higher harm outcome.*

Any Blackfriars Hall property which has been empty for a month or more with a domestic water system has water run on all hot and cold outlets before re-occupation to flush any stale water through.

Asbestos Policy

The Control of Asbestos Regulations 2006 states that asbestos must be properly managed, and that as a body responsible for maintenance and repair of buildings, Blackfriars Hall has a duty to manage any asbestos that is, or may be, present in Blackfriars Hall properties.

Under the Regulations, all non-domestic buildings are included, whatever the type of business; as well as the common areas of residential rented buildings (eg hallways, staircases, lift shafts, roof spaces). This means that any Blackfriars Hall property with common areas (eg sub-divided buildings with a shared entrance and staircase) will require an asbestos record to be kept, regardless of the need or intention to carry out any maintenance works.

See **APPENDIX A** –*List of Blackfriars Hall properties with common areas*;

The Asbestos Record for each property will contain the following information:

- Location of any asbestos-containing material (ACM) and its condition, or:
- Confirmation that the building is free from ACM

The Asbestos Record will be completed by a specialist contractor, will be held centrally as a computer-based record, and will be accessible by staff with responsibility for health and safety, and will be made available to staff with responsibility for maintenance and project work, including Approved Contractors working on behalf of Blackfriars Hall.

The Asbestos Record for each property will be reviewed annually in November, and a visual check of any ACM will be made on an annual basis by the Housing Management Officer responsible for each property. Any deterioration, damage or disturbance of the ACM should be reported to the Housing Manager, who will employ the services of a specialist contractor to repair, encapsulate or remove the affected ACM.

Where it is known that ACM is present, the Asbestos Record should be made available to any contractors who may be working in the property.

Bursary staff will receive, as part of their induction programme, basic training on the identification of ACM, how to access and read an Asbestos Record, and when it is necessary to provide the relevant information to Approved Contractors. At the present time Blackfriars Hall is not aware that any of its properties contain asbestos

When large scale refurbishment works are planned on any Blackfriars Hall property, where it could be possible for ACM to be present (i.e. where a property was built before 1999, before the ban on asbestos use was brought into force), an updated asbestos survey will be procured as part of the works programme. These surveys will be held in the centrally for future reference.

Energy Performance Certification

As of the date of writing of this policy, all of Blackfriars Hall's accommodation is located in listed buildings for which Energy Performance Certification exemptions apply. The Hall's parent charity that owns the buildings, the English Province of the Order of Preachers, has engaged specialists to develop an alternative sustainability programme for the buildings.

Smoking and the Health Act 2006

Since the 1st July 2007 it has been illegal to smoke or allow smoking in enclosed public areas of properties. The Health Act 2006 provides the framework for smoke-free legislation and also creates a number of criminal offences for those who choose to ignore or break the law. The Health Act 2006 imposes certain obligations on Blackfriars Hall as a housing supplier. This policy is also designed to protect employees, tenants, customers and visitors from exposure to second hand smoke.

Blackfriars Hall has a 'no smoking' policy throughout all of its premises, in both public and private areas. These arrangements are reflected in Blackfriars Hall's licence agreements.

Enforcement

Enforcement can be difficult. People smoking tobacco products in prohibited areas are politely asked to desist. Residents who refuse to desist from smoking in a public area of the Hall after being asked politely are provided with a letter from Blackfriars Hall advising them:

- that their failure to adhere to this policy is a criminal offence, and that, unless the tenant complies with the law, action may be taken against them
- draws the tenant's attention to the clause in their tenancy agreement referring to the need to comply with the requirement to have smokefree areas as defined in The Health Act 2006
- of the support offered from their student advice service for smoking cessation.

If the resident continues to smoke in a banned area then the Bursary will refer the matter to Blackfriars Hall's Senior Dean who will arrange a meeting with them, and if the resident continues to smoke in a banned area after this meeting then they are sent a standard solicitors' letter. If no positive response is received to the solicitor's letter Blackfriars Hall will move towards possession proceedings.

Visitors who refuse to desist from smoking are politely asked to leave buildings (with the assistance of security staff if necessary).

Property Inspections

Blackfriars Hall carries out full property inspections annually in its HMOs at the end of the normal 10 month licence period. The inspection routine checks the property for:

- disrepair
- the quality of previous work undertaken in the property
- management issues relating to resident behaviour
- matters relating to the health & safety regime for that type of property.
- the permitted level of occupancy within the property.

Residents/tenants are given advance notice of the inspection if this must take place while they are still in situ and they are invited to be present; inspections are not intrusive but are thorough.

A record of the inspection is kept and any observations noted during the inspection are then acted upon.

Communal corridors, stairwells and external areas are checked regularly by Junior Deans and other relevant staff and contractors to ensure

- the cleanliness of these areas - free from litter, clutter, and unauthorised storage
- that lighting and fire detection systems function properly
- that waste is being properly disposed of, the bins emptied regularly and to maintain clean bin areas
- the standard of garden maintenance
- the correct security arrangements are in place
- all external locking systems and gates are working properly

Housing Act 2004 - Risk Based Assessment and Licensing

Part I of the Housing Act 2004 introduced with the Housing Health and Safety Ratings System (HHSRS) consists of a risk-based assessment and an inspection of a property by a qualified person, normally an environmental health officer.

The officer rates 29 areas of risk and scores them. If the score is above a certain numerical point then a Category 1 hazard exists and this needs rectifying and the Local Authority can take enforcement action if this action is not taken.

The HHSRS applies to all houses, except Local Authority and RSL stock. This includes owner occupied houses and all private rented housing (whether an HMO, or licensed or not).

The link between the HHSRS and licensing (Part II of the Act) is that if an HMO requires licensing then it is more likely to be inspected under the HHSRS although indications are that few formal HHSRS inspections are taking place by the Local Authority in respect of compliant licensed properties where no other problems have been reported.

Housing Act 2004 Part II

Part II of the Act defines an HMO and also defines what properties need licensing. In brief, in student housing, any house that is shared by 3 or more unrelated students is likely to be an HMO.

If a house is an HMO is shared by five or more persons then it is licensable. The licence lasts for 5 years (unless a shorter time is granted by the Local Authority) after which a new licence is needed.

Licensed HMOs need to meet a set of regulatory standards laid down by statute as interpreted by the relevant Authority, in Blackfriars Hall's case, the Universities UK Accommodation Code of Practice (ACOP) and the local authority, Oxford City Council. Each license states what standards need to be met and Blackfriars Hall ensures that those standards are met, if necessary, by a deadline contained in the license. It is also a requirement that training is received about HMOs, standards and management and Blackfriars Hall fully complies with this requirement.

All properties in Blackfriars Hall's portfolio that need licensing have a license, and checks on this are carried out annually. In the case of managed properties entering Blackfriars Hall's portfolio, any existing license is transferred into Blackfriars Hall's name or Blackfriars Hall applies, on behalf of the owner, for a license. Blackfriars Hall also ensures that if any changes are made to the property affecting the license then that license is amended.

A central file of relevant licensing information is kept in Blackfriars Hall's offices and information about the UUK Accommodation Code of Practice (ACOP) is displayed by the entrance door of each specific property, referenced in licence agreements, and displayed on the Blackfriars Hall website.

All local authorities maintain a public record of properties licensed under the Act.

From 1 October 2018 mandatory licensing of HMOs in England was extended from only applying to shared houses with 5 or more occupants over 3 or more storeys to include smaller properties used to house 5 people or more in 2 or more separate households.

Oxford City Council has introduced selective licensing and currently runs 3 licensing schemes:

- Mandatory HMO Licensing
- Additional HMO Licensing
- Selective HMO Licensing.

Construction (Design and Management) Regulations 2015

Blackfriars Hall (as a "CDM Dutyholder" under the regulations) has certain responsibilities when undertaking all construction jobs. Blackfriars Hall ensures that suitable management arrangements are in place for construction projects.

For small projects of low complexity, contractors are appointed who are on Blackfriars Hall's list of Approved Contractors, which requires them to have demonstrated that they have sufficient competence and resources to undertake the work. Blackfriars Hall provides suitable pre-construction information to contractors by specifying its requirements for the construction project, details of the site and any existing structures or hazards.

Where projects are notifiable (those lasting more than 30 days, or involving more than 500 person days of construction work) Blackfriars Hall appoints a competent Principle Designer. The CDM Principle Designer co-ordinates the health and safety aspects of design work. This includes:

- ensuring that the Health and Safety Executive are informed of any notifiable projects
- that works do not commence unless a construction phase plan is in place
- facilitating adequate communication between the client, designers and contractors on all matters relating to health and safety.

The Principle Contractor (Designer) also ensures there are adequate welfare facilities on site and compiles a health and safety file for each project. Blackfriars Hall appoints Principal Contractors (Designers) for projects involving more than one contractor. Principal Designers are responsible carrying out risk assessments. Principal Contractors liaise between the Designer and the Duty Holder and coordinator works between contractors.

The Bursar keeps a record of all CDM Co-ordinators appointed in respect of each project.

Housing Students with Physical Disability

In its methodology HHSRS does not take into account any additional risk or vulnerability.

Where Blackfriars Hall is housing a student with a disability, where the chances of hazards is increased, a personal risk assessment is carried out for the student by the Disability Advisory Service of the University of Oxford, which can be acted upon in making any individual adjustments to the arrangements within the dwelling.

Blackfriars Hall's Disability Lead assists in this process and provides additional support, if required, to the student concerned.

The Bursar will carry out a PEEP (Personal Emergency Evacuation Plan) with any tenants who declare a disability to ensure the accommodation is suitable

Insurance Cover

Blackfriars Hall properties are covered by the following policies:

- Employers Liability Insurance
- Public Liability Insurance
- Directors and Officers Liability Insurance
- Buildings and Contents cover

Emergency, Disaster and Incident plan

An Emergency is classed as serious and imminent danger to the health of residents and/or staff, a risk to safety or serious damage to buildings. This Plan works to minimise disruption and prevent worsening of the situation.

This Plan is designed to:

- provide guidance and direction in the event of an emergency situation;
- safeguard property;
- facilitate the early restoration of a building service;
- protect the operation and reputation of the company; and
- provide guidance on when to implement a major incident emergency response

This Plan includes a system of escalation from on-site staff or Bursary involvement, to a full crisis management team depending on the circumstances of the incident. Blackfriars Hall is available 24 hours a day - outside of normal office hours, University Security Services is able to respond to tenant enquiries and they are trained to deal with emergencies and the procedures to take.

In *all* cases, the staff attending the emergency will communicate with, and be directed by, the emergency services in attendance until those emergency services relinquish control of the situation.

Although the Plan concentrates on responding to reasonably foreseeable incidents, they are flexible enough to form the basis of a response to any unpredicted scenario'.

APPENDIX A - Schedules

1. Schedule of Planned Preventative Maintenance (PPM)

Blackfriars Hall has the following properties, where the following checks are made and confirming documentation are checked by Blackfriars Hall staff:

16 St John St

3hr Emergency Lighting Test and Inspection - annual
1hr Emergency Lighting Test and Inspection - annual
Undertake Functional Emergency Lighting Test and Inspection - monthly Service of Gas Boilers – annual
Shower Head Cleaning – quarterly
Tank Inspection - annual
Water Temperature Monitoring – monthly
Seldom used outlets - monthly
Inspection of Unvented Hot Water Heaters - annual
Inspection and test of AOV units including cleaning around seals - annual
Test and inspection of fire alarm systems - bi annual
Legionella Sampling - see section on Legionnaires Disease above
Emergency lighting - see section on Emergency Lighting above

17 St John St

3hr Emergency Lighting Test and Inspection - annual
1hr Emergency Lighting Test and Inspection - annual
Undertake Functional Emergency Lighting Test and Inspection - monthly Service of Gas Boilers - annual
Landlords Gas Safety Inspection - annual
Shower Head Cleaning – quarterly
Tank Inspection – annual
Water Temperature Monitoring – Monthly
Seldom used outlets - monthly
Inspection of Unvented Hot Water Heaters - annual
Inspection and test of AOV units including cleaning around seals - annual
Test and inspection of fire alarm systems - bi annual
Legionella Sampling - see section on Legionnaires Disease above
Emergency lighting - see section on Emergency Lighting above

33 St Giles

3hr Emergency Lighting Test and Inspection - annual
1hr Emergency Lighting Test and Inspection - annual
Undertake Functional Emergency Lighting Test and Inspection - monthly
Service of Gas Boilers - annual
Landlords Gas Safety Inspection - annual
Shower Head Cleaning – quarterly
Tank Inspection – annual
Water Temperature Monitoring – monthly
Seldom used outlets - monthly
Inspection of Unvented Hot Water Heaters - annual
Inspection and test of AOV units including cleaning around seals - annual
Test and inspection of fire alarm systems - bi annual
Climate system maintenance (offices) – bi annual
Legionella Sampling - see section on Legionnaires Disease above
Emergency lighting - see section on Emergency Lighting above

Undertake Functional Emergency Lighting Test and Inspection - monthly
Water temperature monitoring - monthly
Bin store automatic door closer

2. Lift locations and maintenance

Blackfriars Hall has one lift in the portfolio;

33 St Giles, maintained by DAB Lifts & Electrical Services
LOLER carried out bi-annually by BES Group

3. Blackfriars Hall properties with common areas:

17 St John St
33 St Giles

4. Sites with Centralised water systems

The following locations are risk assessed every 3 years

16-17 St John St
33 St Giles

APPENDIX B - Health and Safety Responsibilities of Key Staff

Overview

Blackfriars Hall has two main Health and Safety Policies, the *Health and Safety Policy for Housing* and the *English Province of the Order of Preachers Health and Safety Policy*, which addresses office staff. It also has more detailed policies on Fire Safety and Water Safety (Legionnaire's Disease). These are at the centre of the organisation's health and safety regime and detail the commitments and operational requirements in this area across the whole organisation.

The Moderators of Blackfriars Hall have overall strategic responsibility for the Health and Safety Policy for Housing and the Fire Safety and Legionnaire's Disease policies, and for periodically reviewing them to ensure that they are working well operationally and are fit for purpose. They are assisted by, and oversee, the Bursar, who has the central role in the operation of both policies, co-ordinating and verifying that all systems are being properly followed and recorded and who, in turn, supervises others who have direct responsibilities for fulfilling designated tasks under the *Health and Safety Policy for Housing*.

The Moderators, chaired by the Regent, ensure that these policies (and all risk assessments made) are kept under review and formally reviewed annually following input from the Bursar. Any significant policy changes are required to be reported to the Moderators and approved by them.

The current membership of the Moderators includes the Regent, Vice Regent, Secretary of Studies, Welfare Lead, Bursar, Senior Tutor, and Academic Registrar.

The Bursar has a key role within that Review Board and will annually review:

- all operational aspects of the Health and Safety Policy for Housing
- raise any difficulties encountered in that operation
- suggest any improvements or changes that need to be made.

The Regent

The Regent of Blackfriars Hall has overall responsibility for the running and development of the Hall as a branch of the English Province of the Order of Preachers. The Regent is responsible to the Board of Governance for the day to day management of the Hall and is responsible for maintaining accountability to the trustees of the parent charity in policy and development matters.

Vice Regent

The Vice Regent supports the Regent on the oversight, co-ordination, running and on-going development of Blackfriars Hall's service outputs. The Vice Regent reports directly to the Regent.

The Bursar

Health and Safety

Blackfriars Hall has two main Health and Safety Policies, the *Health and Safety Policy for Housing* and its parent charity's *Health and Safety Policy of the English Province of the Order of Preachers*, which covers office staff. These are at the centre of the organisation's health and safety regime and detail the commitments and operational requirements in this area across the whole organisation.

The Bursar has overall strategic responsibility for implementation of both policies and for periodically reviewing plans to ensure that they are working well operationally and are fit for purpose. They are assisted by, and oversee, the Accounts & Accommodation Officer.

The Secretary of Studies of Blackfriars ensures that both policies (and all risk assessments made) are kept under review and formally reviewed annually following input from the Bursar. Any significant policy changes are required to be reported to the Moderators approved by them. The Bursar has a key role within that Review Board and will annually review:

- all operational aspects of the Health and Safety Policy for Housing
- raise any difficulties encountered in that operation
- suggest any improvements or changes that need to be made.
- write an annual report to the Board detailing changes and recommendations made.

Detailed Responsibilities

The Bursar also has:

- overall responsibility for the following key areas of Blackfriars Hall's housing operations:
 - ensuring that safety monitoring systems and maintaining verification documentation take place as required by the relevant policy
 - ensuring housing management cover, including emergency cover, is maintained for the accommodation on a 24 hour seven day a week basis and that this system is capable of dealing with the institutions, parents, students and relevant external agencies following any serious incident
 - ensuring, on taking properties into management, that all proper health and safety documentation is properly available and filed
 - maintaining a set of routines to ensure that the standards within the Blackfriars Hall Code and the National Code for Larger Student Developments are met and maintain a complete set of up to date documentation relating to larger developments as required as part of that Code's verification processes.

The Bursar also:

- draws to the attention of other Blackfriars staff any changes or improvements required to ensure that all of the portfolio meets the required standards of the Local Authority under Housing Licensing and the Housing Health and Safety Ratings System (eradicating all Category 1 hazards identified)
- ensures that if the RRO applies, as it does to all large buildings and to smaller houses let under single tenancy (and for all HMOs in houses by April 2018) then, in the case of larger buildings, they will ensure a full risk assessment relating to fire is kept on file and in the case of off-street properties, that a member of the housing management team complete an individual risk assessment (based on a framework document within the relevant LACORS Guidance) at the point that lettings commence and that a copy of that, for each relevant address, is kept on file. All RRO related risk assessments are reviewed annually
- assisted by the Accounts and Accommodation Officer, ensures that Blackfriars Hall fully complies with the law in respect of its portfolio under the Housing Act 2004, and in particular that all properties that should be licensed have a license that is current and where the conditions of any licence that have been issued are met within the timescales outlined on each licence.
- be the nominated "responsible person" for the organisation in respect of Legionella compliance with the Health and Safety Executive Approved Code of Practise and Guidance (ACOP).

Information and Communication

The Bursar will ensure that (assisted by other Blackfriars staff):

- up to date information is available on Blackfriars Hall's web sites about Blackfriars Hall's portfolio and housing operation and health and safety policies in respect of its housing portfolio

The Bursary Team

The Bursary is the central point for ensuring (including enforcement) that all operational aspects of *the Health and Safety Policy for Housing* are being followed and verifiable records are properly kept and properly filed as part of those procedures. This includes:

- ensuring that the core documentation within the UUK Accommodation Code of Practice verification files are maintained in an ordered and up-to-date manner
- working closely with the Moderators in respect of any issues relating to safety or safety procedures within Blackfriars Hall's own property portfolio, keeping them suitably informed of any problems or developments
- working to ensure that designated housing management staff are inducted, trained and kept up to date in simple risk assessment procedures relating to the Housing Health and Safety Rating Scheme (HHSRS) and know how to undertake risk assessments and ensuring that assessments are undertaken in line with the event policy and records maintained.
- Where hazards have been identified under the HHSRS, to address and minimise those risks.
- Undertaking risk assessments under the Fire Safety Regulatory Reform Order 2005, where applicable.
- Ensuring that Blackfriars Hall fully complies with the law in respect of its portfolio under the Housing Act 2004, and in particular that all properties that should be licensed have a license that is current and where the conditions of any licence that have been issued are met within the timescales outlined on each licence. The Housing Manager - Operations has a role in supporting the licencing processes and the associated administration.
- maintaining an up to date working knowledge of the LGA (formerly LACORS) national guidance on fire safety and ensuring that Blackfriars Hall follows that guidance, as interpreted by the relevant Fire and Rescue Services and Leeds and Nottingham City Councils.

The Bursar will ensure that the following responsibilities are being fulfilled by the Accounts & Accommodation Officer and other members of the Blackfriars team and will make regular, systematic and verifiable checks to ensure that this is the case, dealing with any shortcomings operationally and reporting ,on in-depth issues to the Regent for further action (*the term Blackfriars Hall's properties also refers to managed and leased properties*):

- properties are NICEIC inspected and certificated, in line with Blackfriars Hall's policies and that certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff and tenants (on request)
- gas appliances are serviced annually to GasSafe standards and ensure that all tenants are given copies of Gas Safety Certificates on moving into a property and upon the renewal of the

certificate and that certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff

- fire extinguishers, fire alarms and emergency lighting are serviced annually and that a file of relevant certificates is maintained providing proof of this which is well ordered and readily accessible to all staff
- intruder alarms are serviced in line with Blackfriars Hall's policy
- reports or concerns or issues relating specifically to staff safety or property safety are made to them and raised for any further action required
- fire alarm tests and emergency lighting tests are undertaken, as outlined in the policy and that each test is recorded appropriately in a log and that where a member of staff is absent then cover is provided by another Housing Management Officer so that the tests are carried out. The Housing Manager - Compliance and Logistics will co-ordinate and check the fire alarm testing logs as often as necessary to ensure that testing by Housing Management Officers is in accordance with the health and safety policy and rectifying any shortcomings
- undertake any portable appliance testing necessary and maintain a verifiable record of tests made
- ensure that all instruction manuals provided to tenants within dwellings are accurate and that instructions contain information about how appliances function and should be used, giving particular attention to the health and safety aspects of those instructions
- ensuring that first line and operational responsibilities for controlling any identified risk from Legionella and ensuring compliance with the Health and Safety Executive Approved Code of Practice and Guidance (ACOP) with regard to the control of Legionella bacteria in water systems is being undertaken and ensuring that the obligations of the Code are fully understood and explained to the housing management team by the Team Leader who has first line responsibilities for PPM.
- ensuring that Blackfriars Hall meets its obligations in respect of making Energy Performance Certification available to tenants and those seeking to rent Blackfriars Hall's housing (including managed properties) and will ensure that such certification is easily available on the web and is properly filed in the office.

Accounts & Accommodation Officer

The Accounts & Accommodation Officer will maintain an operational knowledge of Blackfriars Hall's Health and Safety Policies and will undertake a number of important health and safety matters and routines and will draw to the attention of the Bursar any operational difficulties or improvements identified from those routines.

The Accounts & Accommodation Officer will ensure that all of Blackfriars Hall's:

- weekly inspections are undertaken in line with Blackfriars Hall's policies and that any relevant certificates are kept in a central Health and Safety file which is well ordered and readily accessible to all staff and tenants (on request)
- Act as the Deputy Person on matters concerning water safety;
- Assist to ensure that all Health and Safety records are kept up to date and in an orderly fashion at all times.

Accounts & Accommodation Officer will liaise with the Bursar in respect of any concerns or issues relating specifically to staff safety or property safety.

The Bursar will ensure that other members of the housing management team undertake fire alarm

tests and emergency lighting tests, as required, but not less than weekly in larger buildings (in excess of 15 occupants) and that each test is recorded appropriately in a log and that where a member of staff is absent then cover is provided by another member of the housing management staff so that the tests are carried out.

The Bursar will ensure that the central log of testing is available for the Regent to check at any time.

The Accounts & Accommodation Officer will ensure that all instruction manuals provided to tenants within dwellings are accurate and that instructions contain information about how appliances function and should be used, giving particular attention to the health and safety aspects of those instructions.

Undertaking Systematised Monitoring of Planned Preventative Maintenance Contracts and Certain Servicing Routines

Blackfriars Hall will have a number of planned preventative maintenance contracts that cover a number of mechanical and electrical systems within its Nottingham portfolio and offices. These cover both operational systems and health and safety matters including: plumbing maintenance, testing of fire and smoke detection systems, testing of emergency lighting, the correct working of air handling and air conditioning units, the operation of lifts and the maintenance of complex plumbing systems.

The Bursar will prepare contracts for planned preventative maintenance and will have first line responsibility for flagging when contracts are coming to an end to allow sufficient time for renegotiation or tendering for new contracts to be in place in a timely manner.

