

# OPS022 Landlord Compliance Strategy

<b>MONITORING FORM</b>	
Department	Operations
Department Director	Diana MacLean
This policy is applicable to	Landlord Compliance Strategy
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Period of Review	Annually
Date of next review	July 2020
Internal /external consultees (if required.	

## 1. INTRODUCTION

Weslo Housing Management (WHM) has a responsibility to establish and maintain effective policies, procedures and processes to plan, deliver and monitor landlord compliance activities to manage risk across all areas of Landlord Compliance activities to WHM’s customers, staff, contractors, visitors and other stakeholders in premises owned or managed by WHM.

The strategy will be supported by a suite of Landlord Compliance Safety Policies and Landlord Compliance Safety Management Plans providing detailed guidance, procedures and process maps.

## 2. TENANT CONSULTATION

This strategy is based on legislative and regulatory requirements. There has been consultation with internal teams within WHM and tenant representatives.

## 3. SCOPE

For the purposes of this policy it is deemed to include WHM housing stock, all employees (permanent, temporary or contracted) and any other stakeholder if relevant to the Policy.

## 4. OBJECTIVES

The key objectives of this strategy is to describe how WHM will ensure compliance with the Statutory and Regulatory responsibilities as a Landlord and Employer for which the WHM Board of Directors is responsible, and to meet the requirements of the Scottish Housing Regulator’s Scottish Social Housing Charter and the Scottish Housing Quality Standard (SHQS). The strategy has been developed and will be delivered using the following:-

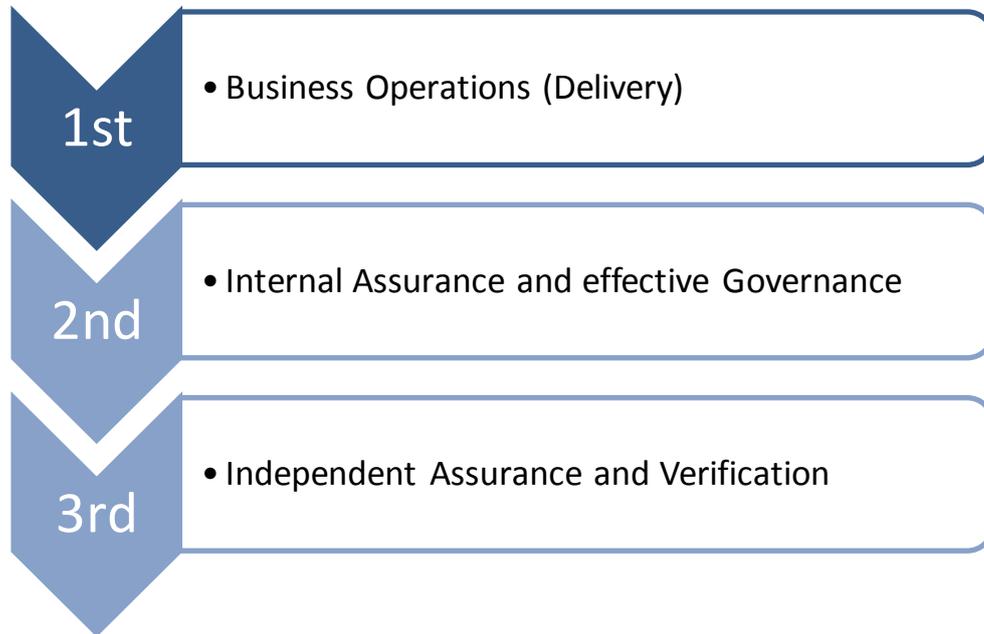
### 4.1 Framework

This Strategy is based on an interdependent framework as illustrated below:



## 4.2 Resources

- I. The WHM Board of Directors and Chief Executive will ensure the Staff Structure and external resource engaged by WHM's includes appropriate people and skills to meet WHM's Landlord Compliance requirements.
- II. The Chief Executive will ensure that the structure and resources enable a three-line defence approach to statutory and regulatory obligations:



- III. WHM will deliver appropriate levels of staff training to embed Landlord Compliance Safety Policies and Management Plans into the culture of WHM.
- IV. WHM is committed to ensuring there is adequate funding available to deliver all Landlord Compliance obligations.

## 4.3 Landlord Compliance Safety Policies

- I. A suite of Landlord Compliance Safety Policies are maintained and reviewed to ensure that all Statutory and Regulatory requirements are met.
- II. The six key Landlord Compliance Safety Policies are appended to this Landlord Compliance Strategy:
  - Appendix 1 – Gas Safety Policy
  - Appendix 2 – Fire Safety Policy
  - Appendix 3 - Asbestos Safety Policy
  - Appendix 4 – Electrical Safety Policy
  - Appendix 5 – Water Safety Policy
  - Appendix 6 – Lifts and Lifting Equipment Safety Policy
- IV. Other potential areas of consideration and policy development are as follows:
  - Play Areas, Trees, Communal Area Safety, Slips and Trips, Personal Fall Protection Systems – low priority and will be in place by 2021

- Radon Gas Safety – WHM are reviewing information available through UKradon to establish if a policy is required.

V. Landlord Compliance Safety Policies include a statement of intent, an outline of regulatory standards and legal obligations, objectives, and specific high level KPIs.

#### **4.4 Landlord Compliance Safety Management Plans**

- I. A Management Plan will be in place for each area of Landlord Compliance incorporating procedures and processes to ensure consistency of approach in the delivery of Landlord Compliance responsibilities.
- II. Process maps will detail the key end to end processes mapped out in a simple coherent fashion.
- III. WHM will monitor the implementation of the Management Plans through regular performance reporting (outlined in Section 7).

#### **4.5 Data Management Protocols**

- I. WHM's Master Database will contain all asset information and the appropriate asset hierarchy to enable effective management of all Landlord Compliance areas of responsibility.
- II. The Master Database will contain all key asset and property data including the key attributes that require to be managed to ensure WHM is compliant for every asset (e.g. gas, the location of lifts/hoists , fire safety check requirement etc).
- III. A hierarchy will be established between the Master Database and all other databases and spreadsheets to ensure that all records are aligned to the Master Database and updates are managed according to protocols.
- IV. All amendments to the Master Database (addition of new assets, demolition, sale and disposal of its assets, changes to the type of tenure etc.) will be effectively managed and documented in line with the Data Management Protocol.

#### **4.6 Performance Management**

- I. Landlord Compliance Safety Policies and Management Plans will ensure that there will be visibility of performance at all levels in the business.
- II. Reports on the current level of landlord compliance will be at appropriate frequencies and to the following key groups within the organisation:
  - Management Team (MT)
  - Executive Team (ET)
  - WHM Board of Directors

	Technical Services	ST	ET	WHM Board of Directors
<b>PI</b>	Weekly	As requested	As requested	
<b>KPI</b>	Weekly	Monthly	Monthly	All Board Meetings *
<b>Progress Report</b>	Monthly	Quarterly	Quarterly	Quarterly **

\* Initially but quarterly after suitable bedding in period

\*\* Initially but six monthly after suitable bedding in period

#### 4.7 Assurance

- I. WHM Board of Directors are required to seek appropriate assurance that this strategy is being implemented.
- II. Appropriate independent external audit arrangements will be established to test the quality of the outputs across all areas of Landlord Compliance and to give WHM Board of Directors, , reasonable assurance in relation to the level of landlord compliance.
- III. The Internal Audit Programme will test all areas of Landlord Compliance in the first twelve months following approval of the Landlord Compliance Safety Management Plans and thereafter a programme will be set up using the following frequencies which are based on the level of risk to WHM. These frequencies will be subject to review based on risk.

Compliance Area	Internal Audit Frequency
Gas	Annually
Fire	Annually
Electricity	Two yearly
Water	Two yearly
Asbestos	Three yearly
Lifts	Three yearly

- IV. The Quality Assurance process will have a clear link to WHM's Risk Register.
- V. A report will be prepared annually for the WHM Board of Directors confirming the outcome of both internal and external Quality Assurance checks.

The following table sets out the roles and responsibilities:

Weslo Housing Management Board	<ul style="list-style-type: none"><li>• Legal entity responsible ensuring Weslo meets its landlord compliance standards. It oversees discharge of policies, ensures appropriate governance and undertake remedial action to ensure compliance.</li><li>• Require regular assurance from KPI reporting.</li></ul>
Chief Executive	<ul style="list-style-type: none"><li>• Retains overall responsibility for the monitoring of consistent implementation of the Compliance Policies</li></ul>
Director of Operations	<ul style="list-style-type: none"><li>• Will appoint/nominate Responsible Person for all areas of compliance.</li><li>• Duties are detailed in the relevant management plans</li></ul>
Technical Manager *	<ul style="list-style-type: none"><li>• Provide an effective performance management framework that ensures strong risk control and high level of assurance</li><li>• Provide effective monitoring to ensure management actions arising from audit are responded to within timescales.</li></ul>
Human Resources Director	<ul style="list-style-type: none"><li>• Ensure awareness of policies and provide effective monitoring of policy review dates</li></ul>
Responsible Person	<ul style="list-style-type: none"><li>• Ensure operational implementation of policies and effective management and performance reporting.</li></ul>

- Reflects current structure

## 5. EQUALITY & DIVERSITY

This Strategy will always be carried out in accordance with WHM's Policy of Equality & Diversity which aims to promote diversity, fairness, social justice and equality of opportunity by adopting and promoting fair policies and procedures.

## **6. PUBLICISING AND AVAILABILITY**

This Strategy is available on the WHM website, to Board of Directors and staff members and any other key stakeholders. Copies are available free of charge. A summary of this policy can be made available in other formats and languages on request.

## **7. MONITORING & REPORTING**

This Strategy will be reviewed regularly to ensure compliance with applicable legislative changes, changes within the organisation and best practice.

## **8. COMPLAINTS**

Anyone wishing to make a **formal** complaint about the services provided by WHM should do so using our Complaint Procedure.

Further information on how to make a complaint can be found at:

<https://www.weslo-housing.org/wp-content/uploads/How-to-Make-a-Complaint.pdf>

## **9. OTHER RELEVANT POLICIES AND PROCEDURES**

This Policy relates to:

- i) The Asbestos Safety Policy
- ii) The Asbestos Safety Management Plan
- iii) The Electricity Safety Policy
- iv) The Electricity Safety Management Plan
- v) The Fire Safety Policy
- vi) The Fire Safety Management Plan
- vii) The Gas Safety Policy
- viii) The Gas and Carbon Monoxide Safety Management Plan
- ix) The Lifts and Lifting Equipment Safety Policy
- x) The Lifts sand Lifting Equipment Safety Management Plan
- xi) The Water Safety Policy
- xii) The Water Safety Management Plan

The above must be read in conjunction with this Policy.