

Lift Safety Policy

Policy Owner	Patricia Carr, Group Health and Safety Manager
This policy is applicable to	All companies within the Group
Approved by	KMT
Date approved	27 th January 2022
Frequency of review	Annually
Date of next review	August 2025
Implementation date	27 th January 2022
Key related documents (policy, procedure, customer literature)	All compliance documents.
Sources of best practice or guidance used in developing this policy	See section 2

Version control

Version number (see note 1)	4	Author of Policy	Karbon Managers with advice from Savills – February 2018
Equality Impact Analysis (see note 2)	Initial/Full	Equality Analysis Date	
Privacy Impact Analysis (see note 2)	Initial/Full	Privacy Analysis Date	

Document change history

Version	Date	Changed sections
2	March/April 2021	Responsible Officers; Frequency of Review changed from 2 years to 3 years on recommendation of Auditors. Policy reviewed end March/beginning April 2021, next review due beginning April 2023 Make explicit the inclusion of York Housing Association
3	August 2021	Frequency of Review changed to 2 years on request of Compliance Manager to align with Management Plan
4	January 2023	Cover page, frequency of review changed from 2 years to annually on request of AD Strategic Insight and AD Buildings & Customer Safety. Replace inclusion of YHA with inclusion of all subsidiary companies.
5	21 st February 2024	Annual review – no change
6	23 rd August 2024	Amended to include reference to our Approach to Vulnerability Policy

Consultation	
Consultation Group (if applicable)	Date of Consultation (if applicable)
Staff	Not applicable
Union(s)	Not applicable
Customers	Not Applicable
Human Resources / Organisation Development	Not applicable
Health and Safety Working Group	August 2021
Other stakeholder (please state) KMT	January 2022

Risk policy is designed to control

To comply with all regulatory and legislative requirements plus ensure the safety of staff and customers.

1.0 Objectives of the Policy

Karbon Homes and its subsidiary companies (hereby known as 'The Group') are regulated by the [Regulatory Framework for Social Housing 2015](#), and the statutory responsibility for discharging the landlord obligations surrounding lift safety rests with them. The Group must also undertake a monitoring role to ensure that they can demonstrate a validated landlord compliance position, thereby leading to the Group being overall compliant against Legislative and Statutory requirements

The objectives of this policy are detailed below;

- To ensure we provide a safe environment for customers, colleagues and third parties to live and/or work
- Establish the key principles that the Group will utilise to ensure lift safety.
- The Group will discharge the landlord's duty in [Health and Safety at Work Act Etc.\(1974\)](#) - Section 3 requires that non-employees are not exposed to risk, and Section 4 requires that non-domestic premises in which the employees of others may work are safe and without risk to health; both duties are qualified by the caveat "so far as is reasonably practicable". Section 2 requires that the health and safety of employees is ensured, so far as reasonably practicable.
- To ensure that all powered lifts and equipment installed for which it has a responsibility are installed, maintained, serviced and used comply with [PUWER \(Provision and Use of Work Equipment Regulations 1998\)](#) and which includes the following;
 - Ensure that all lifts provided for use in work activities when in use are thoroughly examined by a competent person. The inspection regime will be undertaken in accordance with the 'examination scheme' and before a lift is used for the first time.

- Ensure regular visual and functional checks are undertaken including non-lifting parts based upon a risk assessment (e.g. checks that alarm equipment is operating correctly)
- Ensure weekly visual and functional checks are undertaken by building managers, check safe operation and alarm equipment is operating correctly.
- All lifting equipment (including adaptations), including accessories will be clearly marked to indicate their 'safe working loads' (SWL) - the maximum load the equipment can safely lift.
- To achieve lift safety compliance in accordance with our management plans.
- Provide clear lines of responsibilities for the management of lift safety.
- Ensure the Lift Safety Management Plan supports the delivery of this policy.
- Provide a commitment to customers who are affected by lift safety to communicate and raise awareness regarding the key issues.
- To provide a timetable for the review of the Lift Safety policy and Lift Safety Management Plan.
- Provide clarity of the method used for reviewing and monitoring lift safety compliance.

This document will be stored in KARBON HOMES' SharePoint for internal stakeholders and available to view by external stakeholders via KARBON HOMES internet portal.

2.0 Compliance with Regulatory Standards and Legal Obligations

The application of this policy ensures compliance with the regulatory framework for social housing in England introduced by the HCA in April 2012 which requires all housing providers to 'meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

The Group acknowledges and accepts their responsibilities under [LOLER \(Lifting Operation and Lifting Equipment Regulations\) 1998](#). A key aspect of both is the "used for work / by workers" criteria. PUWER and LOLER apply in workplaces and in non-workplace communal parts that may be used by workers. They may also apply in dwellings that contain equipment used by people in a work capacity.

This notwithstanding; the Health and Safety at Work etc. Act 1974 Sections 2, 3, and 4 also apply.

It is essential we ensure customers, residents, employees and visitors remain safe in our premises (both individual homes and offices), failure to properly discharge our legal responsibilities may result in:

- Prosecution by the Health and Safety Executive under Health and Safety at Work etc. Act 1974
- Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007
- Regulator of Social Housing serious detriment judgement
- Reputational damage
- Loss of confidence by stakeholders in the organisation

This policy operates within the context of regulatory legal frameworks as follows:

- [Health and Safety at Work etc. Act 1974](#)
- [Pressure Systems Safety Regulations 2000](#)
- [BS EN 81-1:1998 \(Electric Lifts\)](#),
- [BS EN 81-2:1998 \(Hydraulic Lifts\)](#)
- [Lift Regulations 1997](#)
- [Control of Substances Hazardous to Health Regulations 2002](#)
- [Control of Pollution \(Oil Storage\) \(England\) Regulations 2001](#)
- [Management of Health and Safety at Work Regulations 1999](#)
- [Workplace \(Health Safety & Welfare\) Regulations 1992](#)
- [Control of Asbestos Regulations \(CAR\) 2012](#)
- [Landlord and Tenant Act 1985](#)
- [The Construction Design and Management Regulations 2015](#)
- [The Lifting Operation and Lifting Equipment Regulations 1998 \(LOLER\)](#)
- [Provision and use of Work Equipment Regulations 1998 \(PUWER\)](#)
- [The Equality Act 2010](#)
- [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations \(2013\)](#)
- [The Regulatory Framework for Social Housing 2015](#)

3.0 Scope

This policy relates to offices, general needs housing, supported housing, sheltered housing, other rented properties owned by the Group, communal areas including leaseholders/shared ownership, other rented housing managed by the Group on behalf of a third party, remote plant, garages unless other parties are explicitly specified for statutory responsibility in the lease or management agreement.

Where properties are managed on behalf of external property owners, statutory responsibility will be detailed in the terms of the management agreement.

All premises with lifting equipment (including aids and adaptations lifting equipment where the Group are responsible for maintenance) will be maintained safely, and where applicable, included in the inspection programme and visited in accordance with the timescale identified within the Thorough Examination, and lifting equipment will be serviced in line with the manufacturer's recommendations.

4.0 Policy Detail

This policy, whilst a stand-alone document, must always be read in conjunction with the Lift Safety Management Plan.

The Group will work with third party landlords and occupiers to ensure that lift inspections are carried out. Where they are not, we will arrange for them to be undertaken in accordance with the anniversary date and recharge the landlord.

The Group defines a 'lifting operation' as an operation concerned with the lifting or lowering of a load' including attachments used for anchoring, fixing or supporting the load. A 'load' is the item or items being lifted, which includes a person or people in accordance with Regulation 8(2) of LOLER and includes the following lifting equipment: stair lifts, vertical lifts, ceiling track hoists, mobile hoists, bath lifts and slings etc.

There are two distinct types of lifts in use (this policy covers both lift types);

- Commercial lifts used in communal areas within residential schemes, commercial premises and offices.
- Domestic lifting equipment used within residential schemes, offices and in communal areas (including adaptation stairlifts).

Risk reduction priorities, related to this area, are detailed within the Lift Safety Management Plan and will be considered as part of the annual budget setting process.

There will be a detailed record of all attempts to gain access. If reasonable access is not provided the Group will escalate action and seek a legal remedy to ensure access is gained at the earliest possible opportunity in accordance with best practice.

We will proactively assess data (where available) for relevant information about the customer to help gain access (disability, vulnerability etc.). The process will be detailed in the Lift Safety Management Plan.

Emergency evacuations relating to lift safety should be read in conjunction with the Local Authority local emergency response plan and KARBON HOMES Business Continuity Plan (BCP) should an emergency incident be declared.

Thorough Examination

Where applicable, the Group must ensure a Thorough Examination is undertaken and provide a systematic detailed examination of all lifts and all its associated equipment by a competent person to detect any defects which are, or might become, dangerous

The Thorough Examination involves a thorough examination of the equipment which includes a detailed schedule of checks, appropriate examination techniques, safety-critical parts and testing requirements, drawn up to suit the operating conditions of a specific item of lifting equipment.

In order for the Group to verify that lifting equipment and accessories remain safe for use, and to detect and remedy any deterioration in good time, thorough examinations will be undertaken throughout the lifetime of the equipment as follows;

- Before use for the first time - unless the equipment has an EC Declaration of Conformity less than one-year-old and the equipment was not assembled on site.
- After assembly and before use at each location
- Regularly, while in service
- Following exceptional circumstances (damage or failure/major changes etc.)

The Group will ensure the Thorough Examination report contains information compliant with [LOLER Schedule 1](#).

The specifics of the Group's examination scheme is set out within the Lift Safety Management Plan.

If a defect is identified with the lifting equipment during the examination and/or inspection which in their opinion is, or could become, a danger to people Karbon Homes will be advised immediately and confirm this in the examination process report. The process to be followed is fully detailed within the Lift Safety Management Plan.

Lift Servicing

The Thorough Examination duties notwithstanding, and in accordance with PUWER where applicable, the Group will ensure all lifting equipment is maintained to ensure it does not deteriorate to the extent that it may put people at risk and remains in an efficient state of good repair'

The frequency and nature of maintenance will be based on a risk assessment and is detailed within the Lift Safety Management Plan and considers the following;

- The manufacturer's recommendations
- The intensity of use
- The operating environment (e.g. the effect of temperature, corrosion, weathering) user knowledge and experience
- The risk to health and safety from any foreseeable failure or malfunction

Lift Safety Commitments (Safety Inspections)

The Group will work within the following commitments:

- Where applicable, each item of lifting equipment shall receive inspection(s) as required in [Provision and use of Work Equipment Regulations 1998 \(PUWER\)](#) and [The Lifting Operation and Lifting Equipment Regulations 1998 \(LOLER\)](#).
- In all cases, lift safety inspections, maintenance, servicing, installation and upgrade programmes will be undertaken by competent contractors whose qualifications to undertake such work have been fully assessed i.e., member of Lift and Escalator Industry Association.
- Lift safety servicing inspections will be undertaken within the required inspection date.

- Independent safety checks are carried out as required under LOLER (Lift Operation Lift Equipment Regulations) 1998.
- Ensuring that all relevant lift installations undergo a Thorough Examination in accordance with LOLER (for lifts that carry persons at no more than 6 month intervals, or for lifts that only carry goods at no more than 12 month intervals) and that any deterioration is detected, defects reported, and remedied in good time.
- We will only install; home lifts, stair lifts or platform lifts that meet the requirements of the Machinery Directive, the Machinery Regulations and the relevant British or European standard.
- We will ensure that an additional Thorough Examination is carried out every six months by a competent person following a major incident or in 'exceptional circumstances' which may alter the risks associated with the lifting equipment. These include but are not limited to circumstances where:
 - A lift is damaged or fails
 - A lift is out of use for long periods, or
 - There is a major change in how the lift is used which is likely to affect its integrity.
- We will only install new lifts that meet with requirements of the Lift Regulations 1997 and relevant European standards e.g. new passenger lifts will be compliant with [BS EN 81 part 20 part 1](#) on any projects that will be completed before the end of January 2017. Where a project will be completed after January 2017 passenger lifts will be installed to [BS EN 81 part 20 part 50](#) and the Equality Act 2010).
- Undertake [Safety Assessment Federation \(SAfed\) Inspections](#).(if required).
- All records relating to this service shall be kept for as long as the lift is in service and shall be made available to the tenant(s).
- All activities will be subject to compliance with the [General Data Protection Regulations 2018](#).

In addition, over the next 5 years the Group will work to ensure the standards recommended by the [European Commission](#) are achieved as follows;

- The lift should be fitted with car doors
- Suspension cables will be inspected and replaced where necessary
- That control systems will provide an adequate degree of levelling at landings
- Controls will be capable of being used by an unaccompanied disabled person
- The fitting of human presence detectors on automatic doors will be installed
- Safety gears when initiated to provide controlled deceleration
- A two-way 24-hour communication system in the event of breakdown
- Elimination of any asbestos, particularly in braking systems
- The fitting of a device to prevent uncontrolled upward movement of the car
- Provision of emergency lighting.

Property Classification.

- All properties where a lift is installed will be categorised, and the information held on Capita.

Record Keeping

- The requirement whether to undertake a lift inspection or not will be held within Capita.
- Reports of Thorough Examination of lifting equipment must be kept until use of the equipment ceases and reports of Thorough Examination of an accessory for lifting should be kept for 2 years after the report has been made. EC declarations of conformity (where received) will be kept for as long as the equipment is operated.
- Certificates associated with those visits will be held in an electronic document management system (SharePoint) and shall be made available to the customer(s) when requested.
- We will carry out regular validation checks to the Capita database.
- A Thorough Examination and LOLER record/check will be completed on each property at the time of first recording on Capita, such changes will include:
 - New Property Acquisitions
 - New Build
 - Refurbishment
 - Change of Tenancy or Tenure (any reason)

The Group will repair and maintain all lifting equipment to approved standards and in accordance with the manufacturer's instructions which the duty extends and the procedures (including safety procedures) are detailed in the Lift Safety Management Plan.

Contractors Competency

The Group have responsibility to ensure that contractors are competent and the following controls will operate to ensure competence can be demonstrated.

- For all thorough examinations and supplementary testing, we will use inspectors that are [UKAS accredited to ISO/IEC17020](#) standard.
- All lifting equipment works will be undertaken by trained and competent contractors with appropriate practical and theoretical knowledge and experience of the particular lifting equipment and have an element of independence and impartiality.
- We will use [Lift and Escalator Industry Association \(LEIA\)](#) affiliated contractors for all repairs, servicing and new installations.

The Group's organisational commitment to health and safety is set out in our Health and Safety Policy.

Internal Competency

The Group will ensure that all colleagues undertaking key roles within the delivery and management of this area will have access to training and support applicable to their roles. As part of the Lift Safety Management Plan a detailed competence framework will operate including regular appraisals.

5.0 Monitoring

KARBON HOMES Board will act as Duty Holder and will receive regular reports on the performance of this policy and are accountable for ensuring its implementation.

Both Karbon Homes and its subsidiary companies' **Boards** will receive regular summary reports of the performance in relation to the implementation of this policy and be responsible for ensuring the Group undertakes any necessary remedial action to comply with the policy.

KARBON HOMES Chief Executive will retain the overall responsibility for the monitoring of the consistent implementation of this policy.

Assistant Director of Asset & Regeneration (Karbon Homes) and Heads of Asset Management and Maintenance (subsidiary companies) - The performance of the Responsible Person duties is delegated to the Assistant Director of Asset & Regeneration (Karbon Homes) and Heads of Asset Management and Maintenance (subsidiary companies) who are responsible for ensuring that sufficient competent resources are in place to ensure their capability to comply with this policy. The duties are detailed in the Lift Safety Management Plan

Group Health and Safety Manager – Responsible Person duties for monitoring and review of this Policy are delegated to the Group Health and Safety Manager.

The lift servicing attributes/components will be held within Capita and will be reconciled with the Group's main asset lists and replicated on the lift database on a monthly basis in order to identify any additional properties which require including in the programme i.e. new build, acquisitions, etc.

Monthly reports will be generated for designated senior managers direct from the Capita lift database to ensure progress can be monitored against minimum agreed Key Performance Indicators. KPIs will be reported to Audit and Risk Committee (3 monthly) and Board (6 monthly) as follows:

- % of Passenger Lift LOLER Inspections completed
- % of Passenger Lift Service Inspections completed
- % of Stair, Hoists and Vertical Lift Service Inspections completed.

Regular lift safety meetings will be held and include the relevant Senior Managers to ensure that relevant issues are identified at an early stage.

The production of monthly performance reports will enable managers in all teams to monitor progress against agreed targets.

This service area will be included within the annual Internal Audit programme which will review in particular adherence to process, data and record keeping.

In addition, the Group will seek additional independent quality assurance to ensure we can robustly demonstrate Lift safety compliance by procuring third party independent specialist to regularly inspect, monitor and report on the technical performance and quality of this business-critical service area including:

The independent specialist shall inspect a minimum of 5% of the LOLER and Servicing Lift inspections and any remedial works arising, on a monthly basis, and report their findings each month (the intention will be to increase this to a 10% independent quality assurance inspection by 31 March 2019). Karbon Homes will be notified of any corrective actions that are required and records shall be recorded for electronically.

Lift safety is a high risk area and this policy will be reviewed annually and a strategic review will be undertaken which will include reviewing all operating procedures. If as a result of either the finding of the internal audit process or the 3rd Party Independent Quality Assurances, the service is not performing to the desired level then this will trigger an early external strategic review.

6.0 Glossary of Terms

- **Lifting Equipment** - means work equipment for lifting and lowering loads including people
- **Health and Safety Executive (HSE)** –Non-departmental public body in the United Kingdom responsible for the encouragement, regulation and enforcement of workplace health, safety and welfare, and for research into occupational risks in England and Wales and Scotland.
- **Capita**, Housing Management System, KARBON HOMES' electronic housing management system
- **SAFed** - represents the UK independent engineering inspection and certification industry, which plays a key role in maintaining high standards of safety within the workplace.
- **Business Continuity Plan (BCP)** – Plan that deals with KARBON HOMES response in managing an emergency situation that affect the function of the organisation.

7.0 Equality and Diversity

This policy is implemented in line with the Group's Equality and Diversity Policy and associated legislation. Consideration will be given to all protected characteristics under the Equality Act 2010 to eliminate discrimination, advance equality of opportunity and foster good relations.

This policy and associated documents are available in different languages and alternative formats where necessary.

8.0 Data Protection and Privacy

We have a clear policy on data protection and sharing data with other partners/third parties under the requirements of the UK General Data Protection Regulation. This is clearly set out in the Data Protection Policy for the Karbon Homes Group which in association with the Data Protection Procedures must be followed throughout the operation of this policy.

9.0 Approach To Vulnerability Policy

This policy is applied in line with Our Approach To Vulnerability Policy. Everyone matters. We want people to be treated fairly, have equality of opportunities, freedom, respect, and access to our services.

We will offer support, reasonable adjustments, and adaptations to remove barriers. We will discuss with our customers what is reasonable and appropriate.

In delivering this service we may need to escalate a particular case – if we do then customer vulnerabilities will be considered as part of the decision-making process.

We will support people with vulnerabilities to deliver this service. We will work alongside external agencies such as social services, the police and fire services and other appropriate agencies to help and support people with vulnerabilities in the delivery of our services but also to ensure we meet our statutory and regulatory requirements as a social landlord.

Details are provided in the appropriate areas in this policy.

All our customer policies are available on the website.