



Cobalt
■■■ Housing

**PRESSURE
SYSTEM POLICY**

Lead Director	Director of Property
Reference	POL 18
Version Date	August 2023

1. Introduction & Aim

- 1.1 The purpose of this policy is to ensure Cobalt meets its statutory obligations as a landlord and seeks to provide assurance that pressure systems are adequately managed, ensuring the safety of our tenants, leaseholders, staff and the general public.
- 1.2 To ensure compliance with the Regulations, a Pressure Systems Management Plan will provide detail of the control systems and processes in place to support the identification and management of within our properties.
- 1.3 At Cobalt Housing we are committed to ensuring that all our residents' homes, our offices, and commercial properties are safe and secure places in which to live and work.
- 1.4 The aim of the Policy is to establish the key principles that Cobalt Housing will use to ensure pressure system safety across Cobalt Housing.
- 1.5 This policy applies to all residential and commercial properties owned and managed by Cobalt Housing Limited.
- 1.6 Cobalt Housing will discharge the landlord's duty and provide clear lines of responsibility for the management of pressure system safety to prevent severe injury from the hazard of stored energy because of the failure of a pressure system or one of its component parts.

2. Policy Statement

- 2.1 Cobalt Housing acknowledges and accepts its responsibilities regarding pressure systems and will always ensure that we work in accordance with the required legislation, regulations and guidance referred to in section 5.
- 2.2 This policy will apply to offices; general needs accommodation; other residential rented properties owned by Cobalt Housing and communal areas including leaseholders/shared ownership. The policy will also extend to all individuals employed by Cobalt including contractors and sub-contractors.
- 2.3 Cobalt will take all reasonably practicable steps to prevent and control the risk from Pressure Systems, where applicable, in the properties that we own or manage including residential properties, offices and commercial buildings.
- 2.4 A pressure system is one that contains or is likely to contain a relevant fluid over 0.5 bar. Many types of pressure equipment can be hazardous. these types of equipment can cause serious injuries and even fatalities. Assessing the risks and putting proper precautions in place will minimise the chances of any accidents occurring.
- 2.5 To reduce the risks you need to know (and act on) some basic precautions.
 - Ensure the system can be operated safely, for example without having to climb or struggle through gaps in pipework or structures.
 - Be careful when repairing or modifying a pressure system. Following a major repair and/or modification, you may need to have the whole system re-examined before allowing the system to come back into use.

- Ensure there is a set of operating instructions for all of the equipment in the system and for the control of the system as a whole, including in emergencies.
- There should be a maintenance programme for the system as a whole. It should take into account the system and equipment age, its uses and the environment in which it is being used.
- Fit suitable protective devices and ensure they function properly - for example devices such as safety valves, bursting discs and electronic appliances, and ensure they are adjusted to their correct settings and in good working order at all times.
- Know the operating conditions - including the characteristics of the relevant fluid in the system and the safe operating limits of the equipment.

3 Policy Principles

3.1 Landlord Obligations

- 3.1.1 Cobalt will hold accurate records against each property it owns or manages setting out the requirements for Pressure System risk assessments, safety checks and maintenance that could present a risk.
- 3.1.2 Cobalt will appoint a competent person to take day-to-day responsibility for controlling any identified risks from pressure systems. This will include management of risk assessments, production of a written scheme of examination and the implementation of that scheme to prevent or control the risks.
- 3.1.3 Cobalt will ensure that all required properties are risk assessed by a competent person for potential to cause exposure to pressure systems.
- 3.1.4 This risk assessment should include:
- Management responsibilities, including the name of the competent person conducting the risk assessment.
 - A description of the system, any potential risk sources, and any controls currently in place to control risks.
 - Inspection and maintenance procedures.
 - Records of the inspection and checks conducted and a review date.
- 3.1.5 Cobalt will ensure that a written scheme of examination (WSOE) is developed and implemented for all properties risk assessed as requiring controls to adequately manage the risk from pressure systems.
- 3.1.6 The WSOE 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

- 3.1.7 This policy is applicable to all properties that imposes a 'Duty of Care' on Cobalt Housing in relation to customers, employees, consultants and contractors, while visiting, working or living in and around Cobalt Housing premises where a pressure system is installed and a reasonably foreseeable risk of exposure exists in the following situations;
- Reasonably foreseeable danger to people from the unintentional release of stored energy.
 - Scalding effects of steam which is classed as a relevant fluid at any pressure.
 - Cobalt will ensure that only suitably competent persons, including consultants, surveyors, risk assessors and engineers undertake works in respect of pressure systems. The term 'competent person' in terms of pressure systems is used in connection with 3 specific areas;
 - Drawing up or certifying schemes of examination (Pressure Systems Safety Regulations 2000 (PSSR), reg 8);
 - Carrying out examinations under the scheme (PSSR, regulation 9)
 - Undertaking maintenance activities (PSSR, regulation 12)
 - Organisations should operate with independence with no conflict of interests to provide an impartial assessment.
- 3.1.8 Cobalt will have a robust process in place to gain access to properties where tenant vulnerability issues are known or identified whilst ensuring timely access to any property in order to be compliant with this policy and safeguard the wellbeing of the tenant.
- 3.1.10 Contractor accreditations will be obtained during the procurement process and stored electronically for future reference.

3.2 Compliance Remedial Work

- 3.2.1 Cobalt will ensure there is a robust process in place for the management of any follow-up works required following pressure system risk assessment or where identified by the competent person when undertaking required maintenance activities.
- 3.2.2 Cobalt will ensure repairs identified within the WSOE will be completed as soon as reasonably practicable.
- 3.2.3 Cobalt will ensure that there is a robust process in place should a pressure system give rise to imminent danger. The system will be isolated and not operated.
- 3.2.4 Cobalt will ensure that there is a robust process in place to collate and record details of all remedial works completed against individual pressure systems.
- 3.2.5 Cobalt will ensure there is a robust process in place to investigate and manage all RIDDOR notices issued with regard to pressure system safety.
- 3.2.6 Cobalt will ensure all pressure systems will be serviced annually or sooner.

3.3 Record Keeping

- 3.3.1 Cobalt will maintain a core asset register of all properties that have a pressure system in place. This register hold data of each time the pressure system assessment is carried out.
- 3.3.2 Cobalt will retain all records relating to pressure systems for the life of the equipment.
- 3.3.3 Cobalt will maintain accurate records of all written schemes of control and any associated remedial works. Records should include the person or people responsible for conducting the risk assessment, managing, and implementing the written scheme; any significant findings of the risk assessment; the written control scheme and its implementation; and the results of any inspection, test or check carried out, together with photographs and the dates. This should include details about the state of operation of the system, i.e. in use/not in use.
- 3.3.4 Cobalt will maintain accurate records on the qualifications of all consultants, surveyors, risk assessors and engineers undertaking works on pressure systems.

3.4 Audit

- 3.4.3 Cobalt will carry out an audit of pressure system safety at least once every three years. This audit will specifically test for compliance with the regulation, legislation and codes of practice and identify any non-compliance issues for correction.
- 3.4.2 Cobalt will ensure that a sample audit is undertaken of 10% of all written schemes of control by an independent competent person to ensure that all control actions are being fully and robustly implemented.

3.5 Non-Compliance

- 3.5.3 Any non-compliance issue identified at an operational level will be formally reported to the Director of Property in the first instance.
- 3.5.4 The Director of Property will agree an appropriate course of corrective action with the compliance team in order to address the non-compliance issue and report details of the same to the members of the Executive Management Team.
- 3.5.5 The Executive Management Team will ensure the Board and the Audit & Risk Committee are made aware of any non-compliance issue, so they can consider the implications and take action as appropriate.
- 3.5.6 In cases of a serious non-compliance issue the Executive Management Team and Board will consider whether it is necessary to disclose the issue to the Homes England in the spirit of coregulation as part of the Regulatory Framework.

4 Risk Management

The key risk associated with non-delivery of this policy is:

Risk Register Ref:	Risk:
Health & Safety Breach – Pressure Systems	Failure to comply with key Health & Safety responsibilities for Pressure System safety resulting in regulatory breaches of Health & Safety, and compliance.
Risk Consequences:	Management and Mitigation:
<ul style="list-style-type: none">• Health & Safety breaches – Staff & Contractors• Health & Safety – landlord compliance breaches• Breach of regulatory requirements resulting in fines, penalties or criminal action• Housing regulator adverse grading/intervention• Insurance claims – customers/staff/contractors• Negative Media/Reputation	<ul style="list-style-type: none">• Robust Procurement Including Competency of Contractor• Competent Consultants Utilised to Carry Out Pressure System Assessments• Effective use of OHMS Attributes• Effective Processes and Procedures• Robust Schedule of Pressure system Risk Assessments Completed• Contractors paid for works upon receipt of certification

Key Risk Indicators and Control Limits

Detailed below are the key performance indicators that are reported to board via the landlord compliance report.

- Total Number of systems requiring a WSOE (Written Scheme of Examination) assessment
- Percentage of pressure systems with a valid WSOE assessment
- Percentage of pressure systems serviced within time
- Total number requiring an annual service
- Percentage of remedial actions outstanding

5 Regulatory & Legislative Compliance

5.1 Regulatory Standards

The application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England.

- Health and Safety at Work Act 1974
- INDG178 (Rev 1) Written schemes of examination: Pressure Systems Safety Regulations 2000
- INDG261 (Rev 1) Pressure systems: Safety and you

- L122 Safety of pressure systems: Pressure Systems Safety Regulations 2000 ACoP
- Management of Health and Safety at Work Regulations 1999
- The Health and Safety at Work Regulations (1999)
- Pressure Equipment (Safety) Regulations 2016
- Pressure Systems Safety Regulations 2000
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (1995)
- Schedule 24 of the Product Safety and Metrology (Amendment)(EU Exit) Regulations 2020

5.2 Links to Other Key Documents

Asbestos Management Policy

Asset Management Strategy

Health & Safety Policy

Repairs Policy

6 Governance of this Policy

Equality and Diversity	Customers and vulnerabilities are taken into account in the development of any policies, procedures and plans and Cobalt will provide a tailored approach in respect of service delivery where possible.
Financial and Links to VfM	Business plan provision to deliver regulatory requirements to achieve landlord compliance.
Privacy and Data Protection	Consideration in terms of GDPR needs to be factored in where access is required to undertake a pressure system inspection and tenant contact information is passed to the contractor.
Health and Safety	Failure to implement this policy carries significant risk in terms of health and safety for tenants, staff and contractors and embedding the policy will ensure landlord compliance for Cobalt.
Development and Consultation	The tenant consultative panel have reviewed the policy prior to its approval and recommendations have been adopted
Customer Profiles and Accessing Services Data	Relevant data will be used to determine if a tenant requires support where access to a property is to be obtained.
Monitoring and Review	To provide assurance of how we meet the compliance requirements will be formally reported through KPI's Landlord Compliance reporting and operational risk updates.
Roles & Responsibility	The Director of Property is responsible to the Chief Executive and the Board for ensuring the effective implementation of this policy. Implementation of and adherence to the Policy will be monitored by the Board