

# Radon Gas Policy

Department Policy Name: Health Safety and Environment

GENERAL - EXTERNAL

Policy Approval Date:	25 <sup>th</sup> July 2024	Date of next review:	13/5/2027
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## 1. Purpose

Radon is a colourless, odourless, radioactive gas that occurs in rocks and soils, some building materials and water. The Riverside Group (TRG) aims to proactively manage the potential risk to health arising from radon gas, or the decay products of radon, in buildings owned or managed by TRG and its subsidiaries. This policy sets out the steps TRG will take to identify, assess, and control risks related to radon gas.

This purpose of this policy is to ensure TRG meets its obligations under the following legislation and regulations (as amended):

- The Health and Safety at Work etc. Act 1974.
- The Management of Health and Safety at Work Regulations 1999.
- The Housing Act 2004 which introduced the Housing Health and Safety Rating System (HHSRS) and the Housing Health and Safety Rating System Regulations 2005.
- The Ionising Radiation Regulations 2017.
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
- Control of Substances Hazardous to Health (COSHH) Regulations 2002
- Construction, Design and Management Regulations 2015

TRG will also refer to the following specific guidance and advice on how to comply with the above legislation and regulations:

- HSE Approved Code of Practice (ACOP) L121 Working with Ionising Radiation

## 2. Scope

This policy applies to all buildings owned or managed by TRG, including domestic dwellings, commercial building and any building used as a workplace. Building specific lease or management agreements may define legal responsibility. Where clear responsibility cannot be defined the default position for any building is that TRG will actively manage that risk until a time when clearly defined legal responsibility can be evidenced.

Whilst every TRG building is potentially within scope of this policy, a desktop review of published radon mapping data along with a risk assessment of building construction and occupancy will determine if a hazard exists, and if there is a need to measure radon levels.

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### 3. Principles

UK regulations set out an explicit duty for building owners and employers to assess for potential radon gas hazards, measure radon gas levels and then take appropriate actions if radon levels exceed a defined threshold.

The guiding principles of what TRG intends to accomplish through implementation of this policy are as follows:

- Undertake a suitable and sufficient desktop review to identify TRG buildings that are a potential hazard in relation to elevated radon gas levels.
- Appoint a competent person or persons to manage risk.
- Carry out a cyclical programme of on-site radon testing to buildings identified as a potential hazard.
- Keep a written record of radon test results and make this information available to persons who could potentially be at risk.
- Implements corrective actions or effective control measures to reduce high levels of radon gas identified through testing.

### 4. Further Information & Support

This policy is to be read in conjunction with:

- TRG Radon Gas Management Plan
- TRG Building Safety Framework

### 5. Roles and Responsibilities

<b>Executive Director of Asset Services</b>	<ul style="list-style-type: none"> <li>• Responsible for overall policy implementation.</li> <li>• Will ensure that adequate resources are made available to enable the objectives of the policy to be met.</li> </ul>
<b>Director of Building Safety</b>	<ul style="list-style-type: none"> <li>• Responsible for delivery of the key policy objectives.</li> <li>• Responsible for designing and implementing suitable and sufficient operational procedures, including approval of the Radon Gas Management Plan.</li> </ul>

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<b>Head of Compliance</b>	<ul style="list-style-type: none"> <li>Responsible for the implementation of the Radon Gas Management Plan.</li> <li>Will ensure all appointed individuals have the appropriate levels of skills, knowledge, education, and training.</li> </ul>
<b>Senior Compliance and Contracts Managers</b>	<ul style="list-style-type: none"> <li>Monitor the controls and compliance with management plan.</li> <li>Carry out a cyclical programme of on-site radon testing to buildings identified as a potential hazard.</li> <li>Keep a written record of radon test results and make this information available to persons who could potentially be at risk.</li> </ul>
<b>Head of Health Safety &amp; Environment</b>	<ul style="list-style-type: none"> <li>Responsible for ensuring the policy is kept up to date with prevailing legislation and statutory obligations.</li> <li>Liaising with and monitoring enforcement actions from Health &amp; Safety Executive (HSE) or any other enforcing authority responsible for regulating health and safety law.</li> </ul>

## 6. Risks

Whilst the strategic approach to Building Safety is not risk averse in terms of adopting innovation and striving to be a leader in the sector, the safety of Riverside customers and colleagues is a key priority for the organisation. Therefore, there is no appetite for risk in terms building safety and compliance with the law.

There is however a tolerance for risk in adopting a proportionate approach to building safety activities, risk assessment and the controls implemented.

Key risks are monitored through a set of monthly Key Performance Indicators (KPI's). The suite of KPI's is embedded with the executive management and governance reporting structure.

A building safety risk register is maintained and regularly reviewed to ensure a proactive approach to risk identification, reduction and control.

## 7. Appeals & Complaints

We aim to meet all our duties to assess for potential radon gas hazards, measure radon gas levels and then take appropriate actions if radon levels exceed a defined threshold as detailed in this policy.

We will respond to complaints regarding safety concerns in line with our Complaints Policy and Customer Feedback Procedure.

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## 8. Equality, Diversity and Inclusion

Riverside is committed to Equality, Diversity & Inclusion. We strive to be fair in our dealings with all people, communities, and organisations, taking into account the diverse nature of their culture and background and actively promoting inclusion. This policy aligns with Riverside's Equality, Diversity and Inclusion Policy and has been subject to an Equality Impact Assessment.

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