



Lift Safety Policy

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Our Vision, Our Mission, Our Values

Our Vision

Elderpark Housing will lead the way in delivering outstanding customer services and great places to live.

Our Mission

To provide quality, affordable homes and excellent services which place a focus on our customers and enhancing our communities.

Our Values



Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

Executive Summary

Policy Author

This Policy has been developed by the Director of Maintenance Services who has responsibility for the effective implementation and timely review of the Policy.

Purpose of the Policy

Elderpark Housing has a duty of care to ensure that its lifts are kept and maintained to a safe standard for use by its residents and employees, other members of the public as well as lift maintenance personnel.

The purpose of this policy is to set out how Elderpark Housing will ensure that lifts are correctly maintained and periodically examined in line with current legislation, including new or refurbished lifts.

Aims and Objectives of the Policy

The aim of this policy is to ensure that Elderpark Housing adhere to the robust maintenance regime required for the vertical transportation of people within properties via lifts. This aim also includes the safety of tenants, residents, staff and others using the association's lifts.

The objective is to ensure that Elderpark Housing meet its legislative duties and implements a "thorough examination" inspection regime to all of its lifts at prescribed regular intervals as part of the Lifting operation and lifting Equipment Regs 98 (LOLER).

Legislative and Regulatory Compliance

This Policy sets out Elderpark HA's responsibilities to comply with the relevant legislation and associated regulatory guidance on the use and maintenance of lifts in properties it owns and controls. The principal legislation in this area is as follows:

- The Lifting Operation and Lifting Equipment Regulations 1998 (LOLER)
- All relevant British and European standards including BS EN 81-20: 2014, BS EN 81-50: 2014 & BS 7255:2012
- Provision and use of Work Equipment Regulations 1998 (PUWER)
- The Health & Safety at Work Act 1974
- Management of Health and Safety at Work regulations 2006
- HSE Approved Code of Practice and Guidance document L113 - Safe use of lifting equipment

- Approved Code of Practice and guidance document L22 Provision and Use of Work Equipment Regulations 1998.

The Scottish Housing Regulators (SHR) Regulatory Framework sets out what Landlords must ensure that they meet all of their legal duties and responsibilities and that they adhere to relevant guidance and the requirement of other regulators. SHR requirement relating to Annual Assurance and legal obligations are relevant to this policy and set out in chapter 3 of the framework:

'There is a requirement to notify the SHR of any tenant and resident matters which have been reported to, or are being investigated by the health and Safety Executive, or reports from regulatory or statutory authorities, or insurance providers, relating to safety concerns.'

'Notify us (SHR) of any tenant and resident matters which have been reported to, or are being investigated by the Health & Safety Executive or reports from regulatory or statutory authorities, or insurance providers, relating to safety concerns.'

Equalities

An Equalities Impact Assessment has been carried out and attached to this Policy. This has identified there could be a positive impact upon anyone with a disability that effects mobility. If Elderpark Housings' lifts are well maintained and any repairs carried out in a timely manner this would limit the impact of them being out of service at any time. The Policy also highlights what would happen if a lift was out of service and the actions the association would consider taking to assist anyone with mobility issues that would prevent them from being able to freely move within the building during any period of disruption.

Privacy

Record keeping for the purposes of this policy relate to the contracts that are in place and servicing / thorough examination's records which are carried out. All data will be held in line with GDPR requirements. This Policy is written to be open and transparent in line with FOISA. A GDPR Impact Assessment has been carried out and attached to this Policy.

Related Policies

Policy Title	Location
Asset Management Policy	
Planned and Cyclical Maintenance Policy	V:\Elderpark Policy Suite\Maintenance Policies\M3 Planned and Cyclical Maintenance Policy.pdf
Fire Safety Policy	V:\Elderpark Policy Suite\Maintenance Policies\M11 Fire Safety Policy.pdf
Electrical Installations Conditions Reports (EICR)	
Privacy Policy	V:\Elderpark Policy Suite\IT Policies\IT1 Privacy Policy.pdf
Freedom of Information Policy	V:\Elderpark Policy Suite\Governance Policies\G29 FOI and EI Policy.pdf

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1 Introduction

- 1.2 Elderpark Housing was established in 1975 and currently owns approximately 1340 homes with the majority being in Central Govan although we also have a number of properties within the areas of Ibrox, Kinning Park and Cessnock.
In addition to being a landlord we provide a factoring service to approximately 250 owners.
- 1.3 Elderpark Housing owns and manages properties, which contain passenger lift installations. At present the association has 6 passenger lift installations 5 located within our housing stock and one in the main office at 65 Golspie Street.
- 1.4 Elderpark Housing has a duty of care to ensure that its lifts are kept and maintained to a safe standard for use by its residents and employees, other members of the public as well as lift maintenance personnel.

2 Purpose of Policy

- 2.1 The purpose of this policy is to set out how Elderpark Housing will ensure that lifts are correctly maintained and periodically examined in line with current legislation, including new or refurbished lifts.

3 Aims and Objectives

- 3.1 The aim of this policy is to ensure that Elderpark Housing adhere to the robust maintenance regime required for the vertical transportation of people within properties via lifts. This aim also includes the safety of tenants, residents, staff and others using the association's lifts.
- 3.2 The objective is to ensure that Elderpark Housing meet its legislative duties and implements a "thorough examination" inspection regime to all of its lifts at prescribed regular intervals as part of the Lifting operation and lifting Equipment Regs 98 (LOLER).

4 Legislation Relating to Lifts

- 4.1 This Policy sets out Elderpark HA's responsibilities to comply with the relevant legislation and associated regulatory guidance on the use and maintenance of lifts in properties it owns and controls. The principal legislation in this area is as follows:
- The Lifting Operation and Lifting Equipment Regulations 1998 (LOLER)
 - All relevant British and European standards including BS EN 81-20: 2014, BS EN 81-50: 2014 & BS 7255:2012
 - Provision and use of Work Equipment Regulations 1998 (PUWER)

- The Health & Safety at Work Act 1974
- Management of Health and Safety at Work regulations 2006
- HSE Approved Code of Practice and Guidance document L113 - Safe use of lifting equipment
- Approved Code of Practice and guidance document L22 Provision and Use of Work Equipment Regulations 1998.

4.2 All of the above will be reviewed and assessed when lifts are being modernised, installed or maintained.

5 Scope and Key Objectives

5.1 Elderpark HA has a responsibility to take reasonable steps to avoid acts or omissions, which would be foreseeable as injuring other persons. Elderpark HA's Chief Executive as the duty holder relating to lifts has a specific responsibility to ensure the safety of others, while using the lift. In particular they are responsible for the safe use of the lift, which includes its safe operation, condition (maintenance) and compliance with relevant statutory requirements.

5.2 The key policy objectives are to:

- Ensure we appoint persons with clear roles and responsibilities to manage the risks associated with lifts and lifting equipment
- Ensure we only use suitably qualified contractors and consultants
- Ensure all lifts and lifting equipment have been identified and are subject to a suitable maintenance, inspection and examination regime to ensure the effective operation and safety of such equipment
- Ensure that all required lifting equipment have 'Thorough Examinations' in accordance with LOLER 1998 where this is required
- Ensure any identified remedial works are carried out within recommended timescales, so that lifting equipment are maintained to a high standard
- Ensure a monitoring system is implemented and maintained
- Ensure compliance with all relevant legislation and standards

5.3 Elderpark Housing has within its stock 6 lifts for vertically transporting tenants, staff and other members of the public up varying numbers of floors to access their homes, carry out visits, deliver items, etc. The association also has a passenger lift in their Golspie Street office, used by mainly staff and visitors to the office.

5.4 **Passenger lifts used by people at work**

Elderpark Housing has a vertical platform lift in its main office which is primarily used by staff committee and visitors. This lift is subject to a periodic thorough examination and inspection, as required by LOLER and PUWER.

5.5 **Passenger lifts used by people who are not at work**

Elderpark Housing provide lifts for staff, residents and other members of the public to access upper floors in various blocks of properties we own. However, as LOLER (and PUWER) may not apply where a passenger lift is not used by people at work. Elderpark Housing have taken the decision to ensure that they are safe to use and are regularly maintained and inspected. In essence, these lifts are deemed part of the workplace and Elderpark Housing shall adopt the same robust requirements for maintenance and inspections afforded to lifts that are covered by LOLER and PUWER.

5.6 Section 3 of the Health and Safety at Work Act imposes these general responsibilities, so far as reasonably practicable. As the risks may be the same as when using lifts in connection with work, a similar regime of maintenance, inspection and examination to that required under LOLER and PUWER may be entirely 'reasonably practicable' in managing the risks. In any case, Elderpark Housings insurers may impose demands for similarly stringent levels of risk management to cover public liability.

6 **Organisational Responsibilities**

6.1 In relation to Elderpark Housing the duty owner is the Chief Executive who has overall responsibility for the implementation of this policy

6.2 Elderpark's Management Committee are responsible for monitoring compliance with this policy and will receive compliance reports against policy on a regular basis.

6.3 The Chief Executive has delegated the tasks of managing the duties to the responsible person, who in this case is the Director of Maintenance Services (DMS).

6.4 The DMS as the designated responsible person will ensure that duty holder's tasks are completed and recorded for the safe and suitable operation of the lift. The DMS will also engage the services of an accredited lift consultant to assist in distinguishing these tasks and to provide a quality control aspect of the maintenance works and thorough examinations.

6.5 The Responsible person has the responsibility for implementing this policy and shall provide regular reports to the Management Committee regarding compliance with Lift safety maintenance and thorough examinations.

6.6 Responsibility for implementing this policy, includes:

- Ensuring adequate processes and procedures are in place to manage the risks arising from lift servicing and thorough examinations (LOLER);
- Ensuring sufficient information, instruction is available, and training if required;
- Monitoring the performance of Elderpark Housing compliance, staff and contractors by providing Key Performance indicators;

- Ensuring that there is sufficient resource to manage that appropriate inspections and examinations are made to assess the condition and safety of lifting equipment;
 - Ensuring that there is sufficient resource in order to highlight any works required following a service or Thorough Examination (LOLER) and ensure that they tracked to completion within the allocated timescales;
 - Ensuring that property servicing records and any relevant certification are maintained;
 - Ensuring that there is sufficient resource in order to maintain an up-to-date knowledge of legislative requirements and current best practice;
 - Provide regular instruction and refresher training to maintain skills and provide advice on the application of this policy on an individual case by case basis;
 - Report to the Health Safety and Environmental Manager of any significant incidents in relation of the management of lifts
- 6.7 The Competent person who will engage in “thorough examinations” shall be a person or organisation that has the appropriate practical & theoretical knowledge and experience relating to lifts so that they can detect defects or weaknesses and assess how important they are in relation to the safety and continued use of the equipment”. The ‘Competent person’ will be independent from others who undertake Elderpark Housing’s regular lift servicing and maintenance to provide impartiality in making objective decisions”.
- 6.8 The responsible person will ensure that the person undertaking the examination is competent. In meeting this requirement, Elderpark Housing shall ensure that the Competent person has the appropriate knowledge and accreditation to carry out thorough examinations.
- 6.9 Failure to meet this criteria can result in severe consequences. Should an accident or incident (or even a near miss) occurred in one of Elderpark Housing’s lifts and it was deemed that the person undertaking the LOLER inspection was not a ‘competent person’, the duty holder would be liable for breaking their regulatory duties. This could lead to criminal prosecution of the duty holder.
- 6.10 Regular Maintenance and Inspections shall be carried out by the approved and accredited Lift maintenance contractor appointed by Elderpark Housing.
- 6.11 Elderpark HA has engaged with a Lift consultant – The Robin Primrose Partnership (RPP) whose appointment includes providing advice and accreditation checks for all procurement exercises associated with Lift maintenance, and thorough examinations. RPP will carry out an audit of the thorough examinations, maintenance services and checks for compliance purposes.
- 6.12 RPP will also audit the association’s record keeping in terms of services, thorough examinations, quality control of repairs and any other tasks associated with Lift safety to meet our legislative duties.

7 Lift Inspection Regime

7.1 All lifts are subject to the Health and Safety and Work Act, notably Regulations pertaining to the Lifting Operations and Lifting Equipment Regulations (LOLER) and the Provision and Use of Work Equipment Regulations (PUWER). SAFed recommends that all lifts should be subject to an effective servicing regime and thorough examination by a competent person. Records of servicing and maintenance together with thorough examination reports should be kept and provided to the regulatory authorities (HSE/Local Authority) when requested. Any actions required by the thorough examination report should be completed as soon as possible and before the time specified on the report. Where a dangerous defect has been detected requiring immediate cessation of work, the lift should not be used until the defect has been rectified and the lift declared safe to use.

7.2 A thorough examination is a systematic and detailed examination of the equipment and safety-critical parts, carried out at specified intervals by a competent person who must then complete a written report. This report must contain the information required by LOLER Schedule 1, including:

- The examination date
- The date when the next thorough examination is due
- Any defects found which are (or could potentially become) a danger to people.

7.3 The following lifts will be subjected to periodic thorough examinations by Elderpark HA's competent person.

Location	Type	Year installed	Frequency
1 Clynder St	Passenger Lift,	1998	6 monthly
10 Elderpark St	Passenger Lift	2011	6 monthly
1 Skene Rd	Passenger Lift	2008	6 monthly
65 Golspie St (Office)	Vertical platform lift	2020	6 monthly
64 Golspie Street	Passenger Lift	2020	6 monthly
20 Harmony Row	Passenger Lift	2020	6 monthly

7.4 Records of maintenance services and thorough examinations shall be recorded in Elderpark Housing's lift Safety database. This shall include all dates of servicing, thorough examinations as well all remedial works, repairs and their timescales for rectification along with any other significant incidents/events will be recorded in the database.

7.5 If the lift is unavailable for inspection, a non-inspection notice will be issued and the responsible person will arrange another inspection.

- 7.6 The inspection report will provide a list of defects and observations. Where defects are found which affect continued safety and or are highlighted as requiring immediate rectification, the lift plant will be switched off until the defect is rectified. Observations will be programmed in for works to be completed as soon as possible.
- 7.7 Where Elderpark Housing is unable to meet the time specified to undertake the specified repairs required in the inspection report, the lift will be switched off until the repair is completed. Any other defects identified, which have not been given a specified time will be completed as soon as possible or at the next service visit, but within six months of notification.
- 7.8 The 'Competent Person 'will advise Elderpark Housing of any supplementary tests required above and beyond the maintenance provision offered under the lift maintenance contractor's maintenance regime. In these cases an instruction will be issued to the lift maintenance contractor and the Responsible Person will retain all relevant records to evidence the equipment was found to be satisfactory.
- 7.9 Supplementary tests are requested when concerns about the condition of the lift equipment are identified during the inspection. They are not mandatory and have no legal status. Elderpark Housing will follow best practice and supplementary tests will assist in ensuring that we satisfy our legal requirements.
- 7.10 An Access Process Map setting out the steps taken to ensure servicing and thorough examination are conducted and recorded is provided in Appendix 1.

8 Lift Maintenance

- 8.1 The Responsible Person will put in place adequate maintenance provisions and ensure that a competent lift maintenance contractor is appointed and the service regime is in line with BS EN 13015. BS EN 13015 states that the lift shall be maintained and kept in good working order as detailed in the original installer's instructions or maintenance manuals for the lift or lifting platform.

Location	Type	Year installed	Maintenance Frequency
1 Clynder St	Passenger Lift,	1998	3 monthly
10 Elderpark St	Passenger Lift	2011	3 monthly
1 Skene Rd	Passenger Lift	2008	3 monthly
65 Golspie St (Office)	Vertical platform lift	2020	3 monthly
64 Golspie Street	Passenger Lift	2020	3 monthly
20 Harmony Row	Passenger Lift	2020	3 monthly

- 8.2 The lift maintenance contractor will provide a site specific risk assessment for each lift installation. This must be kept on site along with the lift maintenance contractor's log book.
- 8.3 The frequency of service visits will be based on passenger usage, age and condition of the equipment together with the location and type of building and local environment. The frequency varies for passenger lifts from monthly to six monthly intervals. Bath hoists and stair-lifts are serviced annually.
- 8.4 Any break in a lift's service has a disproportionate impact on people with families, older people and people with a disability. We will aim to resume the lift operation as quickly as possible where these groups are affected. Where there is a delay in getting the lift back in service, for example when parts have to be ordered, Elderpark Housing will consider putting in place a portage service to assist.
- 8.5 Elderpark Housing will ensure that the appointed lift maintenance contractor carries out the following checks:
- Lift alarm and auto dialler is connected to a remote alarm receiving Centre
 - Housekeeping and condition of the lift machine room and lift equipment and that they are kept clean and tidy.
 - The lift logs are updated and document that regular maintenance visits are being carried out
 - The risk assessment is retained and updated if there is any change to the lift Installation during the period of the maintenance contract.
 - Copies of the latest reports carried out by the 'Competent Person' forwarded by the Association are acknowledged, assessed and retained.
 - Written confirmation that any works to address defects highlighted in the reports are completed where appropriate.
- 8.6 Elderpark Housing will ensure that their insurers will receive confirmation of services and thorough examinations for insurance purposes. This is required as part of the annual insurance renewal process with Elderpark Housing's insurance provider.

9 Lift Incidents

- 9.1 In the event of any major lift components failing, all Elderpark Housing's lifts are fitted with fail-safe mechanisms to prevent injury.
- 9.2 Any faults with the lift should be reported to Elderpark Housing and the relevant contact number is placed in each Lift Car/block where the lift is situated. All incident records shall be recorded and maintained within Elderpark Housing's Lift safety database.

- 9.3 In the event of an incident, as defined by the HSE, a Reporting of Injuries, Diseases and Dangerous Occurrence Regulation (RIDDOR) form will be completed and sent to the Health & Safety Executive (HSE) by the Director of Maintenance.
- 9.4 If someone becomes trapped in a lift car an emergency communication system will enable direct communication between passengers and the lift maintenance contractor's 24/7 call centre. The lift maintenance contractor will attend within one hour of being notified, however, if for any reason the lift maintenance contractor is not able to attend site within this timescale, the Association shall arrange for Fire & Rescue Services to effect the release of trapped passengers.
- 9.5 If the Fire and Rescue Services or any other party forces open the lift doors the lift then the lift MUST immediately be taken out of service and Lift Service Company informed. The lift will have to undergo a number of critical safety inspections by a competent lift engineer before it can be put back into service. If doors are forced, it will be necessary to cordon off area in front of entrance until a lift engineer can attend and secure doors.
- 9.6 Only the appointed competent lift engineers or the Fire and Rescue Services may free /rescue passengers from a lift. A person without adequate training MUST NOT attempt to open landing doors or rescue trapped passengers as this can result in extreme hazard
- 9.7 In the event of a major injury or fatality, the lift will remain isolated and locked off until the HSE has inspected the lift. In such an event Elderpark Housing's insurers will be notified immediately and the lift will not be put back into service until authorised to do so in writing by the HSE.
- 9.8 If a lift is out of service for an extended period, we will consider temporarily decanting residents if a move is required because of medical conditions who are fully dependent on using the lift. As an alternative and subject to an assessment of the mobility needs of residents the association will consider the temporary installation of stair lifts where these can safely be accommodated.

10 Stair Lifts and Hoist Platforms

- 10.1 We will maintain residents' own lifting equipment. Usually these are fitted as an adaptation, and Elderpark Housing being responsible for the maintenance and servicing. In some circumstances these are fitted by the tenants themselves, and may not be maintained or serviced. If Elderpark Housing is made aware of tenants own installations, Elderpark Housing will provide maintenance to those tenants to enable them to remain mobile within their homes.

11 Training

- 11.1 Elderpark Housing will provide appropriate training for the 'Responsible Person'. The responsible person will receive appropriate training to fulfil the management of compliance requirements related to this role.
- 11.2 The lift maintenance contractor will be required to confirm that its operatives are fully trained and the contractor will hold relevant accreditations for quality management systems, environmental management and occupational health and safety management systems.

12 Confidentiality and General Data Protection Regulations (GDPR) and Freedom of Information (FOI)

- 12.1 The Association is fully committed to compliance with the requirements of the General Data Protection Regulations (EU) 2016/679 (GDPR), which came into force on 25 May 2018. The Association will therefore follow procedures that aims to ensure that all employees, Committee members, contractors, agents, consultants, partners or other persons involved in the work of the Association and who have access to any personal data held by or on behalf of the Association, are fully aware of and abide by their duties and responsibilities under GDPR.
- 12.2 Elderpark Housing is classed as a Scottish Public Authority under the Freedom of Information (Scotland) Act 2002 (FOISA). This act places a duty on Scottish Public Authorities to allow the public access to information they hold. This Policy has been written to ensure openness and transparency in line with this legislation and will be published on our website and available in other formats upon request. Information in relation to records held can also be made available upon request where the request meets the criteria set out in the legislation. Any such request should be made in line with our Freedom of Information and Environmental Policy.

13 Monitoring and Reporting

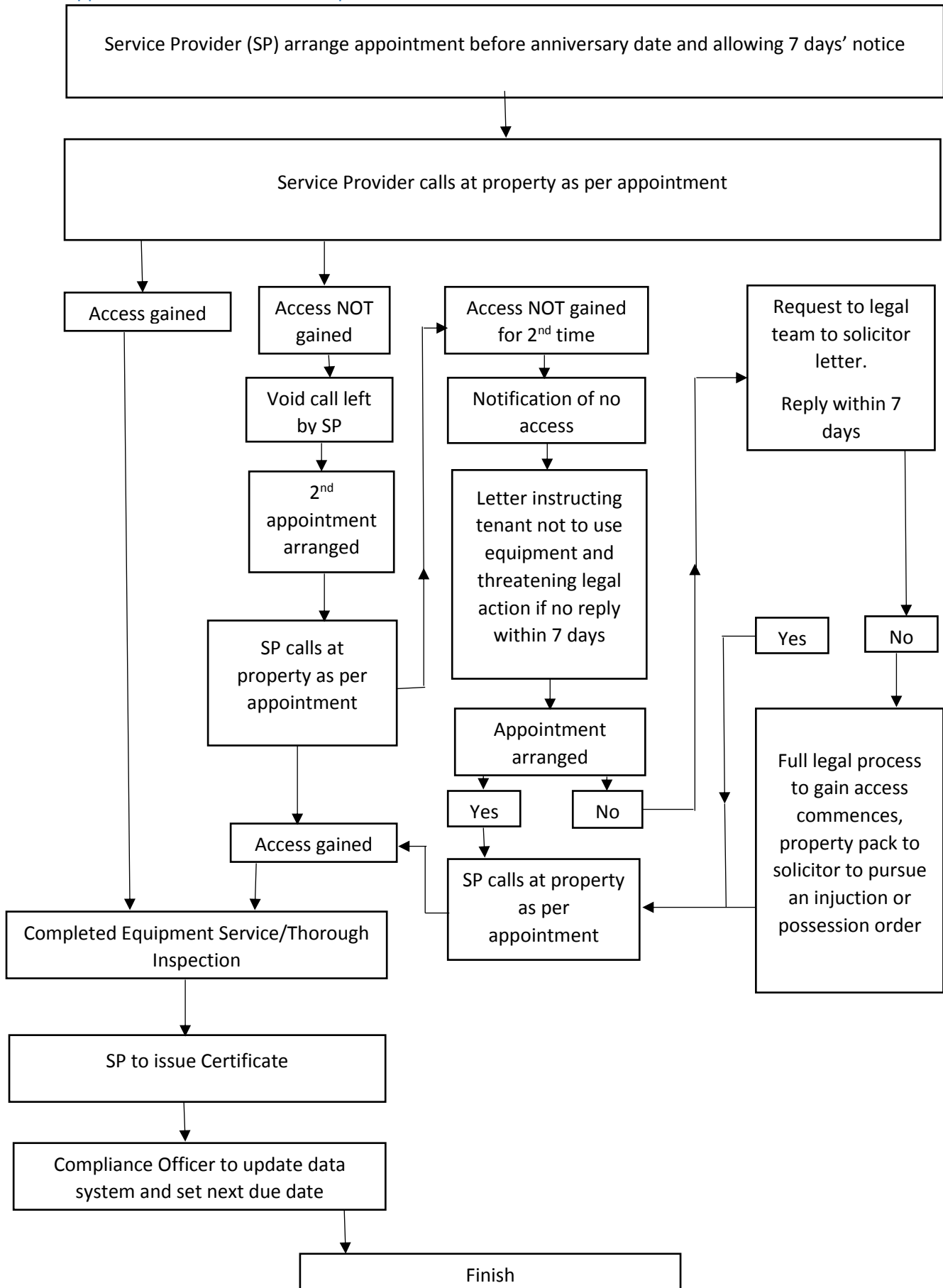
- 13.1 All lift asset information is held on Elderpark Housing's Lift safety database.
- 13.2 The implementation of this policy, frequent compliance reports and any incidents will be reported to and monitored by the Elderpark Housing's Management Committee.
- 13.3 A Key Performance Indicator (KPI) report shall be presented to the Elderpark Housing management Committee providing the following
- Performance relating to meeting the prescribed dates for carrying out Maintenance and servicing of all lifts
 - Performance relating to the timescales for completing remedial works to lifts as specified by the maintenance contractor

- Performance relating to meeting the prescribed dates for carrying out LOLER legislative “Thorough Examination” inspections
- Performance relating to the timescales for completing remedial works to lifts as specified by the “Thorough Examination” inspection results

14 Review

- 14.1 This Policy will be reviewed every 3 years. Consideration will be given to any changes in legislation, good practice or operational changes, which may affect the content of this policy.

Appendix 1 – Access Process Map



Appendix 2 Equality Impact Assessment

Name of Policy to be assessed	Lift Safety Policy	New policy or revision of existing?	Revision
Person(s) responsible for assessment		Kerry Clayton	
1. Briefly describe the aims, objectives and purpose of the policy.	The purpose of this policy is to set out how Elderpark Housing will ensure that lifts are correctly maintained and periodically examined and adhere to a robust maintenance regime to ensure safety of all persons using the associations lifts.		
2. Who is intended to benefit from the policy? (e.g applicants, tenants, staff, contractors)	All persons who use our lifts, this will include tenants, visitors, staff and contractors.		
3. What outcomes are wanted from this policy? (e.g the measurable changes or benefits to members/ tenants / staff)	To operate within legislative requirements and ensure our lifts are maintained to a safe standard. Ensuring the lifts are fit for serving the building they are located within and providing access to properties above ground floor.		
4. Which groups could be affected by the policy? (note all that apply)			
Age		Disability	✓
Gender reassignment		Marriage and Civil Partnership	
Pregnancy and Maternity		Race	
Religion or Belief		Sex	
Sexual Orientation			
5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.			
6. Have those affected by the policy / decision been involved?			
No consultation has been undertaken as the maintenance of lifts is a legal requirement.			
7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.	Positive Impact(s)		Negative Impact(s)
	For those who have a disability that may impact upon mobility will benefit from being able to access safely maintained lifts located within our properties allowing freedom of movement and access to properties above ground floor.		
8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	Operating within the scope of the policy.		
Signed:	Kerry Clayton		
Dated:	19/05/2021		

Appendix 3 GDPR Impact Assessment

Name of Policy to be assessed	Lift Safety	New policy or revision of existing?	Review
Person(s) responsible for assessment		Kerry Clayton	
Briefly describe the aims, objectives and purpose of the policy.	The purpose of this policy is to set out how Elderpark Housing will ensure that lifts are correctly maintained and periodically examined and adhere to a robust maintenance regime to ensure safety of all persons using the associations lifts.		
Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)	Only data relating to the equipment and contractor will be stored.		
What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)	This policy is written in line with our privacy policy and GDPR legislation to ensure compliance with GDPR / FOISA.		
Which groups could be affected by the policy? (note all that apply)			
Tenants		Committee	
Employees		Contractors	✓
If the policy is not relevant to any of the data groups listed above, state why and end the process here.			
Have those affected by the policy / decision been involved?			
Contracts are in place between Elderpark and those involved in implementing this policy. This does not relate to any personal data.			
Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.	Positive Impact(s)	Negative Impact(s)	
	Accurate records will be maintained to demonstrate legal compliance.		
What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)	A procedure for recording serving and thorough inspections could be developed.		

Signed:	Kerry Clayton
Dated:	19/05/2021