



# Lift Safety Management Plan

## (Supporting the Lift Safety Policy)

If you have difficulty with reading this management plan, 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 Values, Our Strategic Objectives

## Our Vision

A vibrant neighbourhood where everyone can prosper.

## Our Values

Caring, Reliable, Fair, Open and Adaptable

## Our Strategic Objectives



## 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 Management Plan and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Management Plan.

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## **1. Introduction and Link to Lift Safety Policy**

- 1.1 Elderpark Housing has a statutory duty as an employer, a landlord and registered provider of social housing to ensure the health, safety and wellbeing of its employees, customers and “other” stakeholders in respect of managing Lift safety (all lifts for lifting people and goods) within its properties and workplaces (this can include contractors, visitors and members of the public).
- 1.2 This management plan should be read in conjunction with the Lift Safety Policy which defines our overall approach to managing Lift safety within our relevant properties to the required legislation. The Policy defines the scope in terms of relevant properties, work streams and people to whom it applies.
- 1.3 This management plan underpins the Lift Safety Policy and contains additional detail of the management arrangements we have in place, to enable Elderpark Housing to comply with all Legislation and standards relating to Lift safety and the policy.
- 1.4 All Elderpark Housing staff who have any responsibility for the management of Lift safety across the organisation, will be required to have read and understood both this Lift Safety Management Plan and the Lift Safety Policy. They will need to ensure that all relevant staff within their team have read both documents.

## **2. Legal and Regulatory Framework**

- 2.1 The Lift Safety Policy sets out the Scottish Housing Regulators framework, including the 7 Regulatory standards and how they apply to Lift safety within Elderpark Housing.
- 2.2 The Lift Safety Policy explains the key legislation in place which Elderpark must comply with as an employer and registered landlord of social housing, which is listed below:
  - The Health & Safety at Work Act 1974
  - The Management of Health and Safety at Work Regulations 1999
  - The Lifting Operation and Lifting Equipment Regulations 1998 (LOLER)
  - Provision and use of Work Equipment Regulations 1998 (PUWER)
- 2.3 In addition to these key pieces of legislation there are other associated regulations, standards and guidance which are applicable to Lift safety, these are:
  - All relevant British and European standards including BS EN 81-20: 2014, BS EN 81-50: 2014 & BS 7255:2012

- HSE Approved Code of Practice and Guidance document L113 - Safe use of lifting equipment
- L22 A Provision and Use of Work Equipment Regulations 1998
- INDG290 Lifting equipment at work.
- INDG422 Thorough Examination of Lifting Equipment
- INDG339 Thorough Examination and Testing of Lifts
- Building Standards (Scotland) Regulations 2014
- Lifts Regulations 1997 (New lift installation regulations).
- L113 Safe Use of Lifting Equipment
- L22 A Provision and Use of Work Equipment Regulations 1998
- The Building Regulations for England and Wales (Part P)
- BS 8560:2017 Code of practice for the safe work at height MEWPS
- BS EN 1756-2:2004+A1:2009 Tail Lifts
- BS EN ISO 10535:2006 Hoists for the transfer of disabled persons
- BS EN 81-40:2008 Stair lifts and inclined lifting platforms
- BS 5900:2012 Powered home lifts
- BS 7255:2012 Code of practice for safe working on lifts
- BS EN 81-80:2003 Improvement of safety of existing passenger and goods lifts
- HSE/SAFed – LG1 Guidelines on the Supplementary Tests of In-service Lifts
- The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).
- HSE Approved Code of Practice and Guidance document L113 - Safe use of lifting equipment.

### **3. Roles and Responsibilities**

- 3.1 The Lift Safety Policy contains details of key roles and responsibilities associated with managing Lift safety for Elderpark Housing. In addition to the management responsibilities set out in the Lift Safety Policy, further detailed responsibilities are set out below:

#### **Duty Holder**

- 3.2 In relation to Elderpark Housing the duty holder is the Chief Executive who has overall responsibility for the implementation of this policy
- 3.3 Elderpark's Management Committee are responsible for monitoring compliance with this policy and will receive compliance reports against policy on a regular basis.

#### **Responsible Person**

- 3.4 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).

- 3.5 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.
- 3.6 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.
- 3.7 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
- 3.8 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".
- 3.9 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.

- 3.10 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.
- 3.11 Regular Maintenance and Inspections shall be carried out by the approved and accredited Lift maintenance contractor appointed by Elderpark Housing.
- 3.12 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.
- 3.13 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.

#### **4. Aims and Objectives of this Management Plan**

- 4.1 The aim of this management plan is to support the Lift Safety Policy in giving more detailed arrangements that Elderpark Housing will have in place to enable us to meet all legal and regulatory obligations and ensure best practice is followed in relation to Lift safety (lifting equipment and lifting operations). We aim to:
- Keep the general public, tenants, and employees aware of the risks associated with Lift installation, as far as reasonably practical, ensure their health, safety and wellbeing in relation to Lift safety.
  - Set out a clear approach to assessing, controlling, and monitoring the risks associated with Lift installations within Elderpark's properties and office premises and complying with associated legislation.
  - Communicate with tenants and staff the importance of Lift safety including providing guidance, training and emergency procedures.
  - Ensure that all procedures relating to the Lift Safety Policy support the fair treatment of all tenants with respect to their different needs, circumstances, and lifestyle.
- 4.2 To meet our aims, we have set the following objectives to be achieved:

- We will comply fully with all relevant legislation, regulations, Standards and Guidance related to lifting operations and lifting equipment applicable to the properties we own and manage.
- We will identify all properties owned or managed by Elderpark, so far as is reasonably practicable, which have any form of lifting equipment installed and identify our responsibility in relation to maintenance, repairs, and thorough examination of the equipment.
- We will ensure all lifts used for lifting people (e.g. passenger lifts and communal stair lifts), and all associated lifting articles are thoroughly examined every 6 months by a competent person. We will also ensure that all lifts for lifting goods, and all associated lifting articles are thoroughly examined every 12 months.
- We will ensure that a suitably competent maintenance contractor is in place to deliver planned preventative maintenance (PPM) to the required frequency to appropriately maintain and repair all lifts, including defects arising from the thorough examination or the maintenance visits. We will ensure these are carried out by a suitably competent contractor.
- We will make best use of suitable software / portal facilities to ensure that all lift assets are accurately recorded, and the cycles of thorough examinations, maintenance and subsequent remedial actions and defects are managed in a consistent manner, to ensure these are completed within the appropriate timeframes and to the required standard.
- We will ensure there are suitable and sufficient emergency plans in place for lift breakdowns, entrapments and any health and safety incidents.
- We will ensure that a lift is taken out of service when recommended by a suitably competent person (either as a result of the thorough examination or the maintenance visit) and we will not reinstate it until the issues have been resolved to the required standard.
- We will ensure that there are clearly appointed accountabilities, roles, and responsibilities to manage lift safety across the business.
- We will ensure there are suitable levels of governance, oversight, and supervision to implement this policy and the associated Management Plan inclusive of making these available to all relevant staff and ensuring that staff with lift safety roles have read and understood the content and what is expected of their role.
- We will ensure that all relevant staff receive appropriate training, including specialist roles and general awareness for lift safety.



- We will ensure suitable and sufficient resources across Elderpark are in place to effectively manage customer relationships and tenancy agreements to keep them informed of the lift arrangements for their home/building and keep them updated with any changes with the lift arrangements, for example when a lift is out of service and what are the alternative arrangements in place. We will ensure we consider the diverse needs of our customers.
- We will ensure that contracts with external contractors are managed effectively, and robust contract monitoring is in place to monitor performance and promote continuous improvement.
- We will ensure that we manage data robustly to assure ourselves that we are accurately and robustly fulfilling our statutory responsibilities as an employer and a landlord relating to lift safety across the business and respond promptly to failures in systems and data management.
- We will ensure we work with all regulatory, statutory and enforcing authorities, including the Scottish Housing Regulator (SHR), the Health and Safety Executive (HSE) and local authorities.

## 5. Lift Thorough Examination Regime

- 5.1 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.
- 5.2 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.

5.3 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

5.4 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.

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

5.6 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.

5.7 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.

5.8 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.

5.9 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.

5.10 An Access Process Map setting out the steps taken to ensure servicing and thorough examination are conducted and recorded is provided in Appendix 1.

## 6. Lift Maintenance Programme

6.1 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 Elderspark 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

6.2 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.

6.3 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.

6.4 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, Elderspark Housing will consider putting in place a porterage service to assist.

6.5 Elderspark 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.
- 6.6 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.

## 7. Lift Incidents

- 7.1 In the event of any major lift components failing, all Elderpark Housing's lifts are fitted with fail-safe mechanisms to prevent injury.
- 7.2 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.
- 7.3 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.
- 7.4 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.
- 7.5 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 of area in front of entrance until a lift engineer can attend and secure doors.

- 7.6 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
- 7.7 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.
- 7.8 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.

## **8. Domestic Stair Lift and Hoists**

- 8.1 As outlined within the Lift Safety Policy, domestic lifting equipment in customers' homes (e.g. stair lifts and bath hoists) are likely not to be used as part of a work activity and therefore are not subject to LOLER and PUWER Regulations in these circumstances.
- 8.2 Elderpark 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.
- 8.3 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.

## **9. Record Keeping**

- 9.1 All Thorough Examinations carried out by the insurer will be held in electronic format and remedials identified in the report will be issued to the maintenance contractor.
- 9.2 Remedial works will be carried out during the maintenance visits by the contractor.
- 9.3 Elderpark systems will record all completed thorough examinations and all completed planned maintenance visits to evidence that these have been completed.

## **10. Training**

- 10.1 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.
- 10.2 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.

## **11. Performance and Assurance**

- 11.1 Section 9 of the Lift Safety Policy contains details relating to the implementation of the policy and what levels of Governance and oversight we have in place. Section 10 of the Lift Safety Policy contains information of who is responsible for providing operational assurance information and how this will be reported.
- 11.2 In addition to those two sections of the policy we will ensure that the Management Committee will receive regular updates on the implementation of the Lift Safety Policy and any Lift Safety Reviews so that they can have assurance that it is operating effectively.
- 11.3 Performance and compliance shall be reported by the Governance and Compliance Manager at quarterly Management Committee meetings and shall include the following:
- No. of Passenger lifts which have had 6 month thorough examinations completed
  - No. of Passenger lifts which have had routine lift maintenance thorough examinations completed
- 11.4 Performance and compliance shall be reported by the Governance and Compliance Manager at quarterly Management Committee meetings.

## **12. Review**

- 12.1 This management plan will be reviewed periodically and when changes in legislation, good practice or operational occur, which may affect the content of this document.

## Appendix 1 – Access Process Map

