

Radon Policy

Objectives

- 1.1 Radon is a natural, colourless and odourless gas. It is formed by the radioactive decay of small amounts of uranium that naturally occur in all rocks and soils. If left unmanaged this radioactive gas can build-up inside properties causing a potential risk to health by damaging lung tissue, and over a long period may cause lung cancer.
- 1.2 Radon levels vary due to an area's geology and day to day building use. The aim of this policy is to provide a radon testing and mitigation programme to identify and reduce the risk in line with prescribed target levels.
- 1.3 The Council will ensure that the risk from radon is managed in accordance with current legislations and guidance. This includes but is not limited to:
 - Housing Act 2004
 - Ionising Radiation Regulations 2017
 - Housing Health and Safety Rating system
 - Health & Safety at Work Act 1974
 - Management of Health & Safety at Work Regulations 1999
 - The Building Regulations (Approved Document C) 2010
 - Construction (Design and Management) Regulations 2015
 - Control of Substances Hazardous to Health Regulations 2002.
- 1.4 Under the Housing Act's Health and Safety Rating System (HHSRS) the Council has a legal obligation to:
 - assess risks associated with radon gas in our properties
 - where the elevated levels of radon gas are identified, take appropriate action to mitigate the reduce this to a safe level.
- 1.5 The Building Regulations (Approved Document C) 2010 also require that where significant alterations are made to buildings or new buildings are constructed in high radon areas, protective measures are taken to eliminate the build-up of radon gas, though the presence of radon in east Oxford does not meet this threshold.
- 1.6 To ensure the Council is able to fulfil its responsibilities in relation to the management of radon the Council will:
 - provide sufficient staffing resource to manage radon gas effectively
 - implement suitable and sufficient governance arrangements to manage the risks associated with radon gas
 - allocate responsibilities and duties to key officers in relation to radon monitoring and management
 - employ competent persons to manage radon programmes
 - conduct radon testing, where required, within suitable timeframes
 - install suitable mitigation to reduce radon levels where testing shows that they exceed the action threshold
 - implement effective radon management record keeping

- operate effective contract management arrangements with the contractors responsible for delivering the service, including ensuring contracts are in place, conducting client-led performance meetings and ensuring the contractors employee and public liability insurances are up to date on an annual basis
- engage with customers to inform and promote radon awareness
- consider use of the legal remedies available within the terms of the tenancy or lease agreement should any tenant, leaseholder or shared owner refuse access to conduct essential radon related inspection and remediation works.
- conduct and maintain a risk and control self-assessment for radon management and operations setting out our key risks from radon and appropriate mitigations. This living document is the responsibility of Property services.

Roles and responsibilities

- 2.1 As a landlord the Council has a responsibility under the Housing Act 2004 to provide residents with safe homes that are free from hazards.
- 2.2 As an employer the Council has a duty to provide a safe working environment to our employees under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999.
- 2.3 The Chief Executive will have overall responsibility for this policy, and delegates day-to-day management of these duties to the Director of Housing and to the Housing Revenue Account (HRA) Assets Lead.
- 2.4 The Corporate Leadership Team will:
- scrutinise the implementation of the radon policy and its related procedure
 - provide sufficient resource for the implementation of a robust and compliant system of radon management, in line with relevant legislation.
- 2.5 The Compliance Manager and the HRA Assets Lead will:
- promote awareness of this radon policy and its associated procedure, across the Council and oversee the management of the radon, ensuring that the Council remains compliant with relevant legislation and guidance
 - develop clear and robust communication with residents about radon
 - regularly report radon programme performance on an agreed consistent basis to the Corporate Leadership Team with regular oversight of radon programme performance by the HRA Assets Lead with direct accountability to the Director of Housing
 - develop, maintain, and regularly review the radon procedure on a quarterly basis
 - develop and implement a radon testing strategy across the housing estate in east Oxford
 - procure and oversee performance management of a competent contractor to undertake radon testing and mitigation work
 - arrange for mitigation work to be completed in a timely and efficient manner, when testing shows this is required

- where required, arrange for the cyclical inspection and maintenance of radon mitigation installations (such as fans, pumps)
- liaise with managers and other employees on matters relating to radon control and provide support and ongoing advice across the organisation
- ensure relevant radon data is recorded, updated, monitored, and held in an appropriate location.

2.6 The Council will:

- ensure that staff and contractors working on radon remediation systems are appropriately trained to do so
- provide residents with information on radon, including any costs associated with mitigation measures installed, at the beginning of their tenancy and make them aware of their radon related obligations in their tenancy agreement
- will consider appropriate actions in respect of of no access to properties further to the need for the inspection and remediation requirements as contained within this policy
- ensure all new build developments are compliant with the relevant radon control legislation and guidance
- provide competent health and safety advice as stipulated in regulation 7 of the Management of Health and Safety at Work Regulations 1999
- investigate accidents and incidents involving radon with a view to highlighting opportunities for improvement.

2.7 Council staff will

- ensure they are aware of the radon management policy and procedure and their duties within these
- immediately report any radon related issues to Property Services

2.8 Residents will:

- follow the guidance supplied around radon safety in their home
- report any faults/defects in the radon mitigation measures which are installed

Programme and remedial works

3.1 The Council will undertake its radon testing programme using the information provided in the UK Health Security Agency's radon map. This assigns areas of the UK a percentage radon potential score.

3.2 The Council does not currently have any properties recorded which sit in a radon affected area above 10%. Therefore the risk of radon in respect of damaging residents' health is limited. However, regular monitoring is required, as stipulated within this policy, to assess the level of radon on a regular basis.

3.3 The Council will:

- Review radon maps and housing stock data to identify properties requiring testing based on location, age, construction type and footprint.
 - Develop a dynamic multi-year testing plan informed by property risk profiling and previous screening results.
 - Deploy passive radon detectors in designated homes according to best practice for optimal placement and duration.
 - Retrieve detectors at radon levels of Becquerels/m³ and analyse these at accredited laboratories.
 - Install appropriate remediation solutions where levels exceed 200 Bq/m³.
 - Conduct rigorous post-remediation validation testing over 3 months during winter to confirm radon reduction.
- 3.4 Where a result of less than 200Bq/m³ is confirmed, no further action will be taken, however the following mitigation measures will be installed:
- Result (in Bq/m³) 200-299 - Passive ventilation system
 - 300-800 - Active ventilation system
 - Above 800 - Active ventilation system (high rated pump)
- 3.5 Following the installation of mitigation measures the property will be retested within a month of this installation to confirm that the radon level has been sufficiently reduced.
- 3.6 Active ventilation systems will be serviced one year after installation and every two years thereafter by a competent contractor.
- 3.7 Properties in 3-10% radon potential bands, or those in 1-3% with mitigation measures installed, will be retested after any change of tenancy or significant alteration, such as a large extension.
- 3.8 Perform further investigative measurements if validation results remain elevated.
- 3.9 Review test records to identify geographical radon hotspots requiring more frequent screening.
- 3.10 Maintain a comprehensive register of all properties tested, results, mitigation details and confirmation testing.
- 3.11 Report any readings above the Health and Safety Executive (HSE) notification levels to Public Health England as required.
- 3.12 Provide tenants with transparent communication on risks, testing schedules, results and mitigation works on an annual basis.

- 3.13 Ensure internal teams and external contractors follow proper radon measurement and installation protocols.
- 3.14 Continually evaluate technological developments in radon prevention and detection solutions.

Data

- 4.1 The Council will maintain an asset register of all properties. This data will be compared to the information in the UK Radon map to confirm the properties that are potentially affected.
- 4.2 All radon testing programmes are managed through appropriate software, and paperwork (such as mitigation installation information and lab testing certificates) which is also transferred to our data records.

Competent persons

- 5.1 Only competent contractors will be used to complete radon related activities. Contractors undertaking this work will be a member of the UK Radon Association or the European Radon Association. When testing is completed radon detectors will be sent for analysis at a laboratory operating under the UK Health and Security Agency validation scheme. This scheme ensures good laboratory practices giving assurance on the quality of results being received.

Resident engagement

- 6.1 The Council consider good communication essential in effective radon management. This will support residents in their understanding of radon and advise residents as to how they can keep themselves and others safe and encourage them to report any concerns to the Council.
- 6.2 The Council will share information clearly and transparently and will ensure that information is available to residents through regular publications and information on our website.
- 6.3 The Council will:
 - implement a suitable radon detection programme across our homes
 - install radon mitigation measures where the radon level detected is above the action threshold of more than 200Bq/m³
 - maintain any radon mitigation measures to ensure they remain effective
 - regularly promote radon awareness with residents
 - advise residents of the results of radon testing undertaken within their homes, including providing specific information and assurance if increased radon levels are detected
 - keep residents updated on any radon mitigation works taking place
 - act upon any radon safety concerns reported by residents
 - consider any suggestions made by residents that could improve radon control

- liaise with residents regularly to discuss radon safety precautions and other compliance matters.

6.4 Residents who are wanting to report a non-urgent safety concern can do so by using this link - [Report a Building Safety Concern with council housing | Instructions – Oxford City Council](#)

6.5 All emergency and urgent safety reports should be made to 01865 249811.

Performance reporting

7.1 Performance data will be provided to the Corporate Leadership Team.

7.2 The content of these reports will include:

- Number of properties where radon testing has been conducted
- Number of programmed properties where radon testing is outstanding, including where detectors have been placed but are still within their three-month testing period
- Number of mitigation installations completed
- Number of mitigation installations outstanding
- Information on cases of no access .
- Narrative in relation to properties where radon testing is outstanding
- Details of radon levels where mitigation installations are required.

Quality assurance

8.1 The Council will review all radon testing certificates to ensure high standards are met.

8.2 All mitigation installations requiring electrical work are reviewed and signed off by an appropriate professional in Property Services.

Policy review

9.1 The policy will be reviewed annually unless there is:

- a significant radon incident
- an important change in circumstances or legislation, which would warrant a review being carried out at an earlier date
- any significant issues raised regarding the policy, by an independent organisation undertaking audit or review.

9.2 All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident or of a Council officer or contractor becoming aware.

9.3 Any non-compliance issues at an operational level will be formally reported to the Operations Manager within Property Services and, where necessary, the

HRA Assets Lead in the first instance, who will agree an appropriate course of corrective action.

- 9.4 In cases of serious non-compliance, the Director of Housing will consider whether it is appropriate to disclose the issue to the Regulator for Social Housing as required by the regulatory framework, or any other organisations such as the Health and Safety Executive.

Equality, diversity, inclusion, and vulnerability (including most at risk groups)

- 10.1 An Equality Impact Assessment (EqIA) has been carried out to determine whether the policy would have an impact on any member of staff, tenants, or contractor workforce, which unfairly discriminates or disadvantages them in the context of the Equality Act 2010.
- 10.2 Whilst the EqIA has identified that there are no particular groups who will be unlawfully disadvantaged by this policy, it is identified that there are certain groups at increased risk from lack of awareness. These groups are:
- children
 - adults with learning difficulties
 - oxygen users
 - people taking certain medication
 - those suffering the effects of drugs and alcohol
 - adults aged 65 and older
 - people with disabilities
 - Individuals being supported by the Community Safety team and related support services
- 10.3 This policy aims to reduce the risks to these groups of people through proactively identifying these risk factors, raising awareness and education.