



HOUSING POLICY



LONDON BOROUGH OF
HARROW

Lift and Lifting Equipment Policy

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1. Purpose

This policy details the London Borough of Harrow's approach to ensuring that lifts and lifting equipment are appropriately maintained and remain safe for continued use.

We recognise that lifts and lifting equipment perform a vital function for residents and customers. Equipment failure may severely restrict their ability to live independently, move around or leave their homes. The London Borough of Harrow (LBH) has a duty of care to address equipment faults and failures and to proactively maintain equipment to reduce failure rates and prolong the working life of the equipment as is reasonably practicable. This policy sets out what we will do to ensure faults and failures are responded to and dealt with appropriately with a supported, proactive maintenance regime.

A consultation has taken place with the Mechanical and Electrical Manager (M&E Manager) and their feedback has been incorporated within this policy.

2. Scope

This policy is applicable to all passenger lifts and lifting equipment including stairlifts, through floor lifts and hoists that LBH has a defined maintenance and repair responsibility for. This includes equipment within residential dwellings, sheltered accommodation and communal areas. This policy does not apply to domestic lifting equipment that residents and customers have purchased and had installed themselves. Where buildings and properties are managed by third parties such as Managing Agents, the maintenance of lifts and lifting equipment will fall under the scope of this policy if there is an agreement in place. The agreement should outline the London Borough of Harrow's responsibilities in terms of lift maintenance.

3. Definitions

We/Us/Our - The London Borough of Harrow (or 'Harrow').

C365 - The London Borough of Harrow's Housing Services' online compliance database which keeps all inspection information and certificates in one place. We use it to track our compliance with asbestos, electrical, fire, gas, lifts and water safety.

EC Declaration of Conformity & UK Conformity Assessment - The EC Declaration of Conformity is a formal statement by the manufacturer that a product meets all relevant EU safety, health, and environmental requirements. It must be signed and kept with technical documentation before the CE mark can be applied. In Great Britain, we use the UKCA (UK Conformity Assessment) after Brexit to indicate it meets all the relevant UK legislation.

LEIA - Lift and Elevator Industry Association is a trade association and advisory body for the lift and escalator industry.

LOLER - Lifting Operations and Lifting Equipment Regulations. This details the regulatory duties of people and organisations that own, operate and have control over lifting equipment. Broadly it requires equipment to be strong and stable enough for its defined use, positioned and installed to minimise risk, used safely and be subject to ongoing thorough examination. "Thorough Examination" - is defined in regulations 2 and 9 of the LOLER and means a systematic detailed examination of the lift and all its associated equipment by a competent person to detect any defects which are, or might become, dangerous, or testing for any purposes included in regulation 9.

PUWER - Provision and Use of Work Equipment Regulations 1998.

M&E - Mechanical and Electrical.

PPM - Planned Preventative Maintenance. This is a proactive approach to maintenance in which maintenance work is scheduled to take place regularly with the aim of preserving the condition of equipment/assets and preventing faults from occurring.

SAFed - Safety Assessment Federation is a trade association representing the UK independent engineering inspection and certification industry, which plays a key role in maintaining high standards of safety within the workplace.

Supplementary Tests - Are tests and/or examinations recommended by a competent person where concerns regarding the condition of equipment arise from the Thorough Examination.

Thorough Examination - This is designed to be a systematic detailed examination and testing of the lift and all its associated equipment by a competent person

4. Objectives

Lifts, lifting equipment, their associated components and essential safety devices are subject to wear and tear, misuse, and vandalism. Regular thorough examination and ongoing maintenance of lifts and lifting equipment is essential to ensure that the equipment remains safe for continued use. This will also ensure prolonged life of the equipment.

London Borough of Harrow has a duty to ensure that lifts and lifting equipment are appropriately maintained and remain safe for continued use. Below we have outlined how we aim to fulfil our duty.

In accordance with LOLER, a regular 'Thorough Examination' should be undertaken of all lifts and lifting equipment. A Thorough Examination is designed to be a systematic detailed examination and testing of the lift and all its associated equipment by a competent person. Their job is to detect any defects which are or might become dangerous.

On completion of a Thorough Examination, the confident person should provide a detailed report of the examination. This should include details of the defects noted, the recommended remedial actions and advice on the required timescale for completion. If the competent person carrying out the Thorough Examination considers there to be an immediate risk to persons or property through continued use of the equipment, they may isolate the item of equipment to prevent use until it is safe to do so. Thorough Examinations should continue to be undertaken throughout the lifetime of the equipment. This will enable us to verify that it remains safe for use and detect and remedy any deterioration in good time.

We aim to make the maximum interval between thorough examinations as follows:

- No more than 6 months intervals for lifts that carry persons.
- No more than 12-month intervals for lifts that only carry goods.

These are the maximum periods between each examination unless there is an examination scheme produced by a competent person in place, which can specify longer or shorter periods depending on the risk of defects arising.

A schedule of Planned Preventative Maintenance (PPM) visits should be considered. Although there is no regulatory requirement to undertake a PPM, it is considered good practice as it can prolong the working life of the equipment. This will further reduce failure rates. If PPM visits are undertaken, it is recommended that the checks, tests, inspections, and adjustments made are in line with the manufacturer's instructions. Generally, PPM visits will form part of the contractual arrangement with the competent contractor appointed to undertake lift and lifting equipment repairs and reactive maintenance. There should be independence between the contractor and competent person undertaking the thorough examinations.

We aim to have a robust process in place to ensure a full and accurate record keeping. We will keep records of all equipment that is subject to a thorough examination and PPM visits. As well as records of the last examination or maintenance visit date and the next due date. Where completion of a thorough examination and PPM visit requires access to a resident's home (e.g. to examine a stairlift). We should have a defined access procedure in place, evidencing that all reasonable and practical steps have been made to complete the examination and maintenance visits. This may include legal proceedings if required.

London Borough of Harrow has a duty to ensure that any reported faults or failures with lifts and lifting equipment are attended to and rectified in a timely manner. There should be defined time periods for attendance, and these should be determined by the severity and impact of the fault or failure.

Thorough Examinations, PPM visits and routine maintenance of lifts and lifting equipment should only be carried out by suitably qualified and competent contractors and engineers. LBH aims to ensure that contractors and engineers have processes in place to verify that only appropriately qualified and accredited engineers are carrying out works to their equipment. This should be supported by a framework of ongoing quality assurance and performance management arrangements.

5. Commitments

The London Borough of Harrow appropriately carries out Thorough Examinations, PPM visits, repairs, and reactive maintenance to lifts and lifting equipment. The following actions and measures demonstrate our commitment to ensuring a safe environment where our residents and customers can live and our staff can work. This policy will be supported by a Lift & Lifting equipment procedure. We are committed to fulfilling our obligations under the following regulatory requirements:

LOLER Thorough Examinations

To ensure compliance with LOLER, we will ensure that lifts and lifting equipment are thoroughly examined as follows:

- Before using lift and lifting equipment for the first time, it must be examined by a competent person. This is unless the equipment has an EC Declaration of Conformity less than one year old and was not assembled on site.
- If it was assembled on site, after the assembly and before use at each location e.g., re-use of stairlifts.
- Regular service at 6-month intervals.
- Following any significant change which may affect the safe operation of the equipment, e.g., a lift is out of use for a long period or there is a major change in how the lift is used which is likely to affect its integrity.

All LOLER Thorough Examinations will be carried out by Harrow's insurance provider, Zurich Insurance. To ensure independence they will not be undertaken by LBHs maintenance contractor. On completion of the Thorough Examination, a detailed report of the examination will be provided to LBHs Insurance and M&E teams. This should include details of the defects noted, the recommended remedial actions and advice on the required timescale for completion.

If the competent person carrying out the Thorough Examination considers there to be an immediate risk to persons or property through continued use of the equipment, they will isolate the item of equipment to prevent use until it is safe to do so. In these instances, they will notify LBH immediately.

Appropriate and timely action will be taken, in line with the examination report, to rectify defects and there will be procedures in place for how defects are managed, logged and tracked through to completion. In addition to defects the Thorough Examination report may recommend that further "supplementary tests" are carried

out, in line with Safety Assessment Federation (SAFed) guidance. We will arrange the completion of these tests via the maintenance contractor.

Planned preventative maintenance (PPM)

In line with industry good practice, we will arrange, via the maintenance contractor, for regular PPM visits to be undertaken in addition to the thorough examinations. The PPM visit will include a variety of checks, tests, inspections, and adjustments, in line with the manufacturer's instructions. The PPM visits prolong the life of lifts and lifting equipment by providing opportunity for potential faults to be identified allowing action to be taken before failure occurs.

The frequency of PPM visits has been determined by giving consideration to risk associated with the type of equipment and the intensity of use.

Equipment type PPM frequency

Equipment type	Planned preventative maintenance frequency
Passenger Lifts	Monthly
Domestic Hoists	At least annually (recommended)
Domestic Through Floor Lifts	Annually
Domestic Stairlifts	Annually
Communal Area Passenger Stairlifts	Quarterly

The above is in addition to the 6 monthly LOLER thorough examination. The contractor will provide evidence of the PPM visit. Any defects along with any engineer comments or observations will be noted on the visit paperwork. As with thorough examination reports, there will be procedures in place to for how PPM defects, comments and observations are managed, logged and tracked through to completion.

Lift and lifting equipment repairs

London Borough of Harrow has an obligation as a landlord to ensure that any reported faults or failures of a lift or lifting equipment are attended to and rectified in a timely manner. A job will be raised for all reported faults or failures and allocated to the lift maintenance contractor. The contractor will be advised of the 'Target Response Time' and the 'Target Fix Time'. These will be determined by the nature of the fault and the impact of the fault as detailed below.

Repair Type	Target response times following work order issued	Target fix time following work order issued	Comments
Emergency	Entrapment (Person(s) stuck inside a non-operational lift) Within 4 hours	Fix where possible or make safe within 4 hours	Repairs needed to avoid danger to health, or that pose a risk to the safety of

			the safety service users. “Make safe” repairs may require a follow up visit to complete the repair.
Emergency	Breakdown Within 4 hours between 8am and 5pm, Monday to Friday	Fix where possible or make safe within 4 hours	Repairs needed to avoid danger to health, or that pose a risk to the safety of the safety service users. “Make safe” repairs may require a follow up visit to complete the repair.
Urgent	Within 4 hours	Fix within 4 days	These repairs do not cause immediate damage to the building, its occupiers, or neighbouring properties or user inconvenience
Routine	Attendance to be confirmed within 5 working days	Fix within 5 working days	This is for further works that may be required following a repair, Thorough Examination or PPM where Harrow will advise of the target fix time

All lift repairs will be carried out in accordance with approved standards and the manufacturer’s instructions.

In instances where it is not possible to return the equipment to working order or it must be turned off for safety reasons and the contractor will inform us immediately. For lifts in communal areas used by multiple residents, the Compliance Team will advise relevant Housing Management and site staff so that residents can be kept informed.

Access procedure

Where access is required to a residential dwelling to carry out a thorough examination or PPM visit (e.g., a stairlift, hoist, through floor lift) this will be managed in line with a documented access procedure. Access attempts will start approx. eight weeks ahead of the due date to ensure that all reasonable and practical efforts have

been made to complete the examination/maintenance visit before the due date, with a full and detailed audit trail maintained. Access efforts will include appointment letters, phone calls and property visits by the contractor and their Housing Officer, with further support from Housing teams if required. The procedure should allow sufficient flexibility to accommodate customer requests and circumstances.

For thorough examinations and PPM visits where dwelling access is not needed (e.g., a passenger lift) the order will be issued to contractor to allow sufficient time for the completion of the examination or maintenance visit before the due date. Support will be given from the Compliance Team and on-site staff to ensure access is gained to all necessary areas.

Certification and documentation

Upon completion of a thorough examination or PPM visit, we will obtain from the contractor an examination or visit report. This will be uploaded to C365 Compliance Database and used to update the examination or visit date. Staff must ensure the next due date is scheduled.

Asset data & reconciliation

We will hold and maintain an accurate record of all buildings and properties that have a lift or lifting equipment. The record will include the type of equipment (e.g., passenger lift, stair lift), the last thorough examination and PPM visit, the examination and maintenance visit frequency and the next due date.

Processes will be in place to ensure that records are updated to reflect any property divestments, acquisitions (including new builds), equipment installations and removals and any changes to maintenance and repair responsibility. We will work towards carrying out a 6-monthly reconciliation between our IT systems which are currently C365 and Cx to provide assurance that all applicable equipment remains captured in the thorough examination and PPM visit schedule. As part of this reconciliation process, we will work towards ensuring that where the responsibility for lift and lifting equipment maintenance falls to a third party (e.g., Managing Agents) action is taken to ensure evidence is obtained that all necessary examinations and maintenance visits have been undertaken.

Contractor competence, quality control and performance

London Borough of Harrow will be able to satisfy themselves that all those carrying out works on lifts and lifting equipment are competent to do so.

All contractors undertaking PPM visits, reactive and routine maintenance must hold Lift Cert accreditation and be a member of the Lift and Elevator Industry Association (LEIA).

Thorough examinations will be undertaken by engineers that are UKAS accredited to ISO/ IEC17020 standard.

All lift and lifting equipment work will be undertaken by engineers with a minimum of a Level 3 industry recognised qualification in lift servicing and repair. This should be supported with appropriate practical and theoretical knowledge and experience.

The Maintenance team will maintain a register of all engineers carrying out works for LBH. This will include the qualifications of the engineers and the expiry date if applicable. Processes will be in place to ensure that the register is kept up to date, e.g., new engineers are added, and that evidence is obtained of any renewed or updated qualifications.

The performance of contractors involved in lift and lifting equipment work will be managed by the M&E Manager, supported by a suite of internal metrics and KPI dashboards. Regular operational meetings are held with contractors within which performance is discussed and documented, with procedures in place to take more formal action to address performance issues if required.

To support performance management, provide assurance on the quality and safety of work and to provide technical advice, we will employ a lift consultant. They will undertake independent quality audits of completed works, equipment condition assessments and provide technical advice and guidance as needed.

6. Responsibilities

The roles and responsibilities for key stakeholders across LBH is detailed below. These are the roles and responsibilities in relation to the delivery of this policy only. The Lift and Lifting equipment procedure will provide further details on the roles and responsibilities of all staff with day-to-day responsibility the maintenance of lifts and lifting equipment.

Managing Director of paid service as the duty holder - Will need to ensure that resources are made available to allow the actions and measures detailed in this policy and any associated procedures to be effectively delivered. They will discharge their responsibilities for the for the delivery of services in line with policy and procedures to the Director of Housing. However, they will retain an oversight on progress and performance.

Director of Housing - Is the responsible person who oversees the overall implementation, regular reviews of this policy and ensures that its objectives are achieved. They are also responsible for compliance performance reporting to the Managing Director of Paid Service.

M&E Manager - Is the deputy responsible person who will be responsible for the day-to-day operational delivery of lift and lifting equipment, related examinations, PPM visits, routine and reactive repairs. They will effectively manage the performance of the service delivery contractors, including their ongoing competence, and proactively monitor service delivery against targets. They will be responsible for monitoring the quality of work undertaken by the contractor and ensuring all certification is received and verified. They will act as the organisations lead on M&E matters and lift safety, ensuring that we continue to work in line with the most up to date regulations and industry guidance. They will also ensure that any compliance and health and safety

related issues are brought to the attention of the Director of Housing. They will also provide regular updates on service delivery against budget.

Building Safety & Compliance Manager - Is responsible and accountable for the overall implementation and regular review of this policy and ensuring its objective are achieved. They are also responsible for compliance performance reporting to the Assistant Director of Homes, Director of Housing, Corporate Health & Safety Board, and the Managing Director.

Under the Fire Safety Regulations 2022, there is a requirement for inspection of lifts which are designed for use by firefighters. There is also a requirement for evacuation lifts that are provided for the evacuation of disabled residents to be inspected. All these inspections will be undertaken by a competent person, and records will be retained.

A monthly check will take place and will involve operation of the firefighters' switch (or evacuation lift switch). This is to ensure that it causes the lift to return to the fire and rescue service access (or evacuation) level. After which, it can be operated only by the controls within the car. Checks will ensure that these controls enable the lift to be taken to an upper floor where the doors can be opened and closed from within the car. We will then conduct a random check to make sure that the landing controls are disabled and cannot call the lift to the floor in question.

7. Legislation and regulations

Elevator standards EN 81-20 and EN 81-50 became effective on 1 September 2017.

- EN 81-20:2014, sets out revised and updated safety requirements for the construction and installation of elevators.
- EN 81-50:2014, defines the test and examination requirements for certain lift components.

These new requirements do not affect existing power lift installations that have been handed over before that date. However, all lifts and lifting equipment are subject to the following regulations:

- Lift Regulations 2016
- Provision and Use of Work Equipment Regulations 1998 (PUWER)
- Lifting Operations and Lifting Equipment Regulations 1998 (LOLER)
- BS 5655 Lifts and Service Lifts
- BS 5622 – 10.1.1: 1995 Lifts and service lifts. Specification for the testing and inspection of electric and hydraulic lifts
- BS 5655 -11: 2005 Code of Practice for undertaking of modifications to existing electric lifts (applicable only to the modernisation of existing lift installations)
- BS 5655 -12: 2005 Code of Practice for undertaking of modifications to existing hydraulic lifts (applicable only to the modernisation of existing lift installations)

- Safety Assessment Federation 2006: Guidelines on the Supplementary Tests of In-service Lifts
- BS 7255: 2012 Code of practice for safe working on lifts
- Machinery Directive 2006/42/EC, which came into force on 29th December 2009
- Revised Construction, Design and Management (CDM) Regulations coming into force on 6th of April 2015
- Work at Height Regulations 2005 (WAHR)
- Confined Spaces Regulations 1997
- BS7671: 2008 First Amendment 2011 (Requirements for electrical installations eighteenth edition)
- Health & Safety At Work Act 1974
- Elevator standards EN 81-20 and EN 81-50

Risk management

The risks of not following this policy are that LBH will not comply with regulatory obligations and will fail to appropriately maintain lifts and lifting equipment. This could have a detrimental impact on the safety of residents, customers and staff and may result in the following:

Prosecution by the HSE under Health and Safety at Work Act 1974.

Prosecution by the Local Authority under the Housing Act 2004.

Prosecution under Corporate Manslaughter and Corporate Homicide Act 2007.

A judgement of serious detriment by the Regulator of Social Housing.

Reputational damage.

Loss of confidence by stakeholders in the organisation.

Non-compliance with Social Housing Regulation Act, in particular the consumer standards

8. Data protection, record storage and retention

Records to evidence thorough examinations and PPM visits will be stored at a property or building specific level within C365 and will be retained for a minimum of 2 years.

London Borough of Harrow will ensure that data is collected as part of the Tenant's Satisfaction Measures. This will included information on lift safety checks (BS05), which will be submitted to the regulator as required.

9. Communication

This policy will be communicated internally to staff via the intranet. Key stakeholders and staff who are impacted by this policy will be briefed as required. This policy will be shared with residents and customers upon request and is available on the Harrow website.

10. Learning and Development

All staff with operational involvement in lift works will need to have and maintain suitable and sufficient system training, e.g., C365 and Cx. The M&E Manager responsible for the day-to-day operational delivery of lift and lifting equipment related examinations, PPM visits, routine and reactive repairs will be required to hold and retain a Recognised Electrical Training Qualification along with practical experience in the maintenance and repair of M&E equipment. They, together with the Building Safety & Compliance Manager will also be expected to proactively maintain their continued professional development to keep up to date with relevant industry and legislative changes.

11. Performance management

The completion of LOLER thorough examinations, along with their due date, forms part of the Health and Safety of Customer's Homes balanced scorecard KPI. This is reported monthly to the Health and Safety Asset Board.

The scorecard KPI specifically reports on LOLER thorough examinations which applies to passenger lifts and lifting equipment (e.g. hoists) in communal areas. The completion of all other thorough examinations and PPM visits (e.g. stairlifts in residential dwellings) is presented monthly to the Housing Assets Health & Safety Board and quarterly to the Customer Services Committee.

There will be regular contract meetings with all suppliers who work on the delivery of lift services. As part of these contracts, service level agreements and other contractual arrangements will be reviewed. Further actions will be required if the service isn't at the acceptable level.

12. Review

This policy will be reviewed every two years, or sooner if required by statutory, regulatory, best practice, emerging developments, or circumstances arising from reviews of other group wide policies. The policy will be reviewed by the Building Safety and Compliance Manager.

13. Equality and diversity

This Policy will be applied in a way which ensures equality of treatment for all customers without discrimination, or victimisation on account of any protected characteristic as defined within the Equality Act 2010. In drafting this policy Harrow has had regard to its public sector equality duties under s149 of the Equality Act 2010, namely the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited under the Act.

- Advance equality of opportunity between people who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The policy pays regard to diversities around access to and delivery of any services. On request LBH will provide translations of all its documents, policies and procedures in various languages and in large print.