

Title Radon Policy

Applicable Company: Calico Homes

Author: Director of Maintenance and Compliance

Signed Off By: Homes SLT

Review Cycle: Bi-Annually

Revision Date: 19/06/2025

Next Review Date: 19/06/2027

Policy Checklist Completed? Yes

Applicable Company: Calico Homes

Contents

1.0	Introduction	2
2.0	Scope	3
3.0	Roles and Responsibilities	4
4.0	Objectives	4
5.0	Radon and Health effects.	5
6.0	Legislation, Guidance, and Regulatory Standards	5
7.0	Radon Monitoring	6
8.0	Responsibility	7
9.0	Monitoring	7
10.0	Equality and Diversity	8
	Appendix 1 - Additional legislation.	9

1.0 Introduction

- 1.1 As a landlord, Calico Homes (Calico) has a responsibility to undertake Radon monitoring to ensure we can demonstrate a validated landlord compliance position, thereby ensuring overall compliancy and meeting all legislative and regulatory requirements.
- 1.2 The key objective of this policy is to ensure our Board, Executive Leadership Team (ELT), Senior leadership team (SLT) employees, partners and customers are clear on our legal and regulatory obligations. This policy provides the framework our colleagues and partners will operate within to meet these obligations.
- 1.3 This policy forms part of our wider organisational commitment to driving a health and safety culture amongst our colleagues and contractors (as detailed within our corporate Health and Safety Policy). It will be saved in our Document Hub and distributed to all relevant colleagues.
- 1.4 Calico Homes is regulated by the Regulator of Social Housing (RSH) (in line with the *Regulatory Framework for Social Housing 2015*) and have a

statutory responsibility for discharging the landlord obligations surrounding Radon gas safety.

2.0 **Scope**

- 2.1 This policy is relevant to all our employees, customers, contractors, stakeholders and other persons who may work on, occupy, visit, or use our premises, or who may be affected by our activities or services.
- 2.2 The policy should be used by all to ensure they understand the obligations placed upon Calico to maintain a safe environment for customers and employees, within the home of each customer, and within all communal areas of buildings and other properties we own and manage. Adherence to this policy is mandatory.
- 2.3 This policy relates to 'at risk':
- Offices
 - General needs housing
 - Extra Care
 - Supported housing
 - Homes for Older People
 - Other rented properties owned by The Calico Group
 - Communal areas include
 - leaseholders/shared ownership
 - Other rented housing managed by The Calico Group on behalf of a third party
 - Remote plant, and garages unless other parties are explicitly specified for statutory responsibility in the lease or management agreement.
- 2.4 Where properties are managed on behalf of external property owner's statutory responsibility will be detailed in the terms of the management agreement.
- 2.5 This policy is applicable to all properties identified to be at risk in relation to Radon gas.

3. Roles and Responsibilities

- 3.1 The Executive Director is designated as the Responsible Person under the legislation because we own and manage properties where customers and leaseholders reside.
- 3.2 The Board has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation and regulatory standards. As such, the Senior leadership team will formally approve this policy and review it bi-annually (or sooner if there is a change in legislation or regulation).
- 3.3 For assurance that this policy is operating effectively in practice, the Board will receive regular updates on its implementation, Radon Monitoring performance and non-compliance.
- 3.4 The Director of maintenance & Compliance has strategic responsibility for the management of Radon Monitoring and ensuring compliance is achieved and maintained.
- 3.5 The Compliance Contracts Manager has operational responsibility for the management of Radon Monitoring.

4.0 Objectives

- 4.1 To ensure we provide a safe environment for customers, colleagues and third parties to live and/or work.
- 4.2 Establish the key principles that Calico Homes will follow, to ensure that Radon gas is managed safely within all properties owned by Calico Homes.
- 4.3 To establish systems that will ensure the identification of properties within Radon gas affected areas.
- 4.4 Ensure properties in Radon gas affected areas are monitored and levels are managed below the action levels and where necessary remedial work is carried out to reduce levels.

- 4.5 To ensure that exposure to colleagues and customers is below the UK Action Level of 200Bq/m³ in domestic property and 300Bq/m³ in the workplace.
- 4.6 Provide clear lines of responsibility for the management of Radon gas levels within properties.
- 4.7 Provide a commitment to customers who are affected by Radon gas safety to communicate and raise awareness regarding the key issues.
- 4.8 Provide clarity of the method used for reviewing and monitoring Radon safety compliance.
- 4.9 Provide sufficient information, training & supervision to ensure that in house teams and contractors working on radon remediation systems are appropriately trained to do so.

5.0 **Radon and Health effects.**

- 5.1 Radon Gas is a colourless, odourless radioactive gas, undetectable by human senses, formed by the radioactive decay of the small amounts of uranium that occur naturally in all rocks and soils.
- 5.2 If high levels of Radon are breathed in over long periods of time this exposure can lead to damage to the sensitive cells of our lungs which increases the risk of lung cancer. Radon causes about 1,000 lung cancer deaths in the UK every year.

6.0 **Legislation, Guidance, and Regulatory Standards**

6.1 **Legislation**

- Health and Safety at Work Act 1974: Requires employers to protect employees from radon exposure.

- Control of Substances Hazardous to Health (COSHH) Regulations 2002 - COSHH provides a framework for the control of exposure to hazardous substances, including radon
- Ionising Radiations Regulations 2017 (IRR17): Sets out requirements to protect workers from ionising radiation, including radon.
- Environmental Protection Act 1990: Manages environmental health risks, including radon.
- Radiation (Emergency Preparedness and Public Information) Regulations 2001: Ensures radon exposure risks are managed in emergencies.

6.2 **Guidance**

- Public Health England (PHE): Provides advice on radon exposure levels, risk assessment, and mitigation.
- Health and Safety Executive (HSE): Offers guidance on testing and mitigating radon in homes and workplaces.
- NHS Radon Advice: Advises the public on radon risks and prevention in high-exposure areas.

6.3 **Regulatory Standards**

- Radon Action Level (UK): Action required if radon levels exceed 200 Bq/m³.
- Building Regulations Part L: Requires radon control measures in new buildings, especially in affected areas.
- Radon Affected Areas: Regions with elevated radon levels where additional building measures are needed.
- Workplace Exposure Limits (WELs): Sets limits for acceptable radon exposure in workplaces.

7.0 **Radon Monitoring**

- 7.1 Calico Homes has a procedure in place to identify properties that are located in an area where the risk of Radon gas could be present.
- 7.2 All properties that are found to be in an area with a probability greater than 1% of being above the Action Level, will be monitored using PHE monitoring devices.
- 7.3 Properties will be checked over an initial 5-year cycle with priority being given to properties in higher probability areas.

- 7.4 If Radon is identified as a potential risk in the workplace, testing will be undertaken and The Calico Group will take action if the Radon gas level exceeds 300 Bq/m³, in line with the latest PHE guidelines.
- 7.5 Calico Homes will work with third-party landlords managing our customers' properties to ensure radon risk assessments and checks are completed. If they are not, we will arrange them and recharge the costs to the landlord.
- 7.6 We internally review 100% of radon testing certificates received to ensure consistent quality.

8.0 Responsibility

8.1 Calico Homes will work within the following commitments:

- Deliver a programme to identify properties at risk from Radon Gas (Radon Gas Atlas).
- Maintain a Radon gas monitoring programme for properties identified to be at risk.
- Sustain an ongoing programme of remedial actions, where necessary, in accordance with Public Health England guidance and best practice.
- Our environmental surveyors will carry out Radon searches as part of the site investigations and remediation for any new builds and, if required, gas membranes will be installed.
- Ensure only competent relevant persons or contractors will be employed to complete radon related activities. Contractors undertaking this work on our behalf will be a member of the UK Radon Association or the European Radon Association.

9.0 Monitoring

- 9.1 Calico will use our asset management system, Active H, to keep records of all properties that lie within a Radon affected area, defined as a greater than 1% risk. There is a 5-year schedule in place to complete monitoring of all affected properties.

- 9.2 New properties requiring Radon monitoring will be identified through the new asset form and managed accordingly by Calico Homes.
- 9.3 Our commitments to our customers Calico Group considers good communication essential in effective radon management, therefore we will commit to effective customer engagement. This will support customers in their understanding of radon and advise them how they can keep themselves and others safe and encourage them to report any concerns.
- 9.4 We also aim to engage with vulnerable and hard to reach customers. We will share information clearly and transparently and will ensure that information is available to customers through regular publications and information on our website. Calico Homes will:
- Implement a suitable radon detection programme across our homes
 - Install radon mitigation measures where the radon level detected is above the action threshold
 - Maintain any radon mitigation measures to ensure they remain effective
 - Regularly promote radon awareness with our customers
 - Advise customers of the results of radon testing undertaken within their homes, including providing specific information and assurance if increased radon levels are detected
 - Keep customers updated on any radon mitigation works taking place
 - Act upon any radon safety concerns reported by our customers
 - Consider any suggestions made by our customers that could improve radon control
 - Liaise with our customers regularly to discuss radon safety precautions and other compliance matters.

10.0 **Equality and Diversity**

- 10.1 This policy ensures that all customers are treated equally, with no discrimination or victimisation based on any protected characteristic as outlined in the Equality Act 2010. Calico Homes has considered its public sector equality duties under Section 149 of the Equality Act 2010, which require the following:

- **Eliminating Discrimination:** Taking steps to prevent any form of discrimination, harassment, or victimisation.
- **Advancing Equality of Opportunity:** Ensuring equal opportunities for individuals with protected characteristics compared to those without.
- **Fostering Good Relations:** Promoting positive interactions and mutual understanding between individuals with different protected characteristics.
- **Ensuring Accessibility:** Calico Homes is committed to providing accessible formats of information, such as Braille, large print, and digital formats for those with visual impairments. We also ensure web accessibility for individuals with disabilities and offer translator services to support effective communication for all customers.

10.2 Additionally, the policy considers the diversity of customers in terms of their access to and the delivery of services, ensuring fair and inclusive treatment for all.

Appendix 1 – Additional legislation.

- This policy operates within the context of regulatory legal frameworks as follows:
- Health and Safety at Work Act 1974
- Workplace (Health Safety & Welfare) Regulations 1992
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulation (2013)
- The Management of Health and Safety at Work Regulations (1999).
- Landlord and Tenant Act 1985
- Housing Act 2004
- Equality Act 2010
- The Construction Design and Management Regulations 2015
- Leasehold Reform, Housing and Urban Development Act 1993 (section 121)
- The Ionising Radiations Regulations 2017 (IRR17)
- Homes and Communities Agency Regulatory Standard (The Home Standard)
- Building Regulations 2010
- L121 (2nd edition) – Working with Ionising Radiation Approved Code of Practice and Guidance

- Control of Substances Hazardous to Health (COSHH) Regulations 2002 -