

Albyn Group

Radon Policy & Procedures

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Policy Sponsor	Helen Sellers

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1.0	Nov 2020	Nov 2023	SHSE Committee

Corporate Fit	
Internal Management Plan	✓
Risk Register	✓
Business Plan	
Regulatory Standards	✓
Equalities Strategy	
Legislation	✓

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1.0 Introduction

- 1.1 Albyn Group aims to incorporate our Purpose, Mission, Values and Vision into our policies and decision making.

With that in mind, we aim to follow our guiding principles that apply to all policies:
<https://www.albynhousing.org.uk/about-us-2019/our-history/>

- 1.2 Radon is a colourless, odourless, radioactive, naturally occurring gas formed by the decay of uranium that is present in all rocks and soils. Some areas of the country – such as parts of Scotland – have higher levels of radon than average.

Outdoors, radon does not present a significant risk to health. However, in some areas, radon can build up to high levels indoors. Where individuals are in those buildings for extended periods of time – such as in a home or workplace – the radon can pose a hazard to health in the long term. Exposure to radon causes around 1,100 deaths from lung cancer in the UK each year.

2.0 Legal and Regulatory Framework

- 2.1 As a landlord, Albyn Group has a general duty of care towards our customers, our tenants, and other residents in the homes we own and manage.

We also have responsibilities under the Regulatory Framework to achieve good outcomes for our tenants and other service users, and under the Scottish Social Housing Charter 2017 to ensure tenants' homes are well maintained.

- 2.2 As an employer and business, Albyn Group has a general duty of care towards our employees and the public, as well as specific responsibilities under:

- Health and Safety at Work etc Act 1974
- Ionising Radiations Regulations 2017

3.0 Aims and Objectives

- 3.1
- To set out a framework to enable Albyn Group to understand and manage the risk from radon for all our homes and workplaces
 - To minimise the risk of one of our customers or employees becoming ill as a result of radon in our buildings.

4.0 Scope

- 4.1 This policy covers all buildings owned or managed by Albyn Group.

5.0 Definitions

- 5.1 **Albyn Group:** Throughout this policy, Albyn Group means Albyn Housing Society and its subsidiary companies.

- 5.3 **Action Level:** This is the level of radon at which action must be taken to reduce radon levels in a building. The action level for homes is 200 Bq/m³ and for workplaces 300 Bq/m³.
- 5.2 **Radon Affected Area:** This is an area where the risk that a property will have radon levels above the Action Level is greater than 1%.

6.0 Roles and Responsibilities

- 6.1 The Director of Assets and Subsidiaries has overall responsibility for this policy.
- 6.2 The Assets Manager has responsibility for the day to day management of this policy.
- 6.3 The Asset Team Supervisor has day to day responsibility for managing the radon testing and remedial action programme.

7.0 Policy Statement

7.1 **Approach:** We will:

- Maintain a radon register;
- Identify properties for which we have a duty to ensure radon levels are safe;
- Assess the risk that radon in those properties is above the Action Level;
- Test the radon level where these properties are in Radon Affected Areas;
- Take remedial action to reduce radon in properties above the Action Level;
- Retest properties following the completion of remedial action;
- Retest properties in Radon Affected Areas at appropriate intervals.

7.2 **Radon register:** We will hold a central record of all assets including:

- Whether we have a duty to ensure radon levels for that asset are safe;
- The risk that the radon level in that asset is above the Action Level;
- Details of any testing carried out;
- Details of any remedial action taken;
- The date when the property is due for retesting.

Every year we will update the register to take account of new stock, disposals, and changes in use.

Every five years, we will review the risk rating of all stock where:

- We are responsible for managing radon, *and*
- The property has not been individually tested.

7.2 **Identification of properties:** We will assess the risk from radon and – where appropriate – measure radon levels and take further action – in the following:

- Rented homes that are owned by Albyn Group
- HMOs and shared accommodation owned by Albyn Group
- Workspaces owned by Albyn Group (except garages).

We will assess the risk from radon and – where a property is in a Radon Affected Area – refer it to the owner for testing and any remedial action – in the following:

- Rented homes owned by another landlord but managed by Albyn Group
- HMOs and shared accommodation owned by another landlord but managed by Albyn Group
- Workspaces owned by another landlord but managed by Albyn Group

We will not assess or manage radon risk in the following property types unless the contract with the owner, or our duty to another resident, requires us to do so:

- Owner occupied properties
- Shared ownership and shared equity properties
- Internal common areas of flat blocks
- Garages.

7.3 **Risk assessment:** Public Health England (PHE) is recognised by the Scottish Government as the primary source of radon advice in the UK. We will use PHE data to identify the risk that our properties have radon levels above the Action Level. We will review this data five yearly to take account of any risk changes.

7.4 **Radon testing:** For properties in Radon Affected Areas, we will test the level of radon present in each individual property. Properties in higher-risk areas will be tested before those in lower risk areas. New build properties will be tested within two years of handover.

We aim to have all properties in Radon Affected Areas tested in line with this policy by the end of 2025/26.

7.5 **Remedial action:** Where a property has been tested and the level of radon present is above the Action Level, we will carry out remedial action to resolve the issue. Where multiple properties require remedial action and there is insufficient budget available for that financial year to complete all the work, properties with a higher radon level will be prioritised over those with lower levels. However, we aim to start remedial action within two years of receipt of the test result.

7.6 **Retesting following remedial work:** Where a property has had remedial work, a seven day test will be carried out immediately to ensure the work was effective.

Work is considered effective where the radon level has fallen to below 150 Bq/m³.

Where the work has not reduced to 150 Bq/m³, the remedial action will be considered incomplete, and further action will be taken to remedy the situation.

- 7.7 **Retesting properties in Radon Affected Areas:** Properties in Radon Affected Areas will be retested at intervals based on the last radon test at the property:
- Properties with previous reading below 100 Bq/m³: Retest within ten years.
 - Properties with previous reading 100-199 Bq/m³: Retest within seven years.

8.0 Performance, Monitoring and Reporting

- 8.1 The following will be reported to the Director of Assets and Subsidiaries quarterly:
- Number of properties with radon duty
 - Of properties with radon duty, number in Radon Affected Areas
 - Of properties in Radon Affected Areas:
 - Number and % of properties untested (by risk level);
 - Number and % of properties tested safe;
 - Number and % of properties tested unsafe and awaiting remedial action;
 - Number and % of properties retested safe following remedial action.

9.0 Complaints

- 9.1 Any complaints about the radon policy or procedure will be dealt with through the normal customer complaints policy.

10.0 Equal Opportunities

- 10.1 This policy does not disproportionately affect any group with a protected characteristic, and complies with Albion Group's Equalities and Diversity Statement.

11.0 Policy Review

- 11.1 This policy will be reviewed by November 2023, or earlier if required.

Albyn Group Radon Procedure

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Leaflet RADON2 FAQs for tenants to be sent with Letter RADON1

Letter RADON3 Notifying tenants of detector collection appointment

Letter RADON4 Test results – no remedial action needed

Letter RADON5 Test results – remedial action needed

Summary RADON6 Summary of remedial action

Radon Workflow

1.0 Background

- 1.1 **What is radon?** Radon is a naturally-occurring colourless, odourless, radioactive gas formed by the decay of small amounts of uranium that are present in all rocks and soils.
- 1.2 **Health risks of radon:** Exposure to radiation can damage human tissue and cause cancer. However, outdoors, and in most buildings, radon levels are low, and the risk to health is very small.
- Radon is measured by the number of becquerels per cubic metre of air (Bq/m³). The average level in UK homes is 20 Bq/m³. The risk to health increases as the radon level increases. Public Health England (PHE) recommends radon levels should be reduced where the average level is over 200 Bq/m³. This is called the Action Level. Any action should aim to reduce the level to below 100 Bq/m³.
- 1.3 **Identifying radon risk:** A survey by carried out jointly by PHE and British Geological Survey identified – for every property in the UK - the risk that radon in that property is above the Action Level. PHE publishes a publicly available radon map that divides the UK into squares of 1 kilometre. Each square in the grid is allocated a risk, based on the highest risk of any property within that square. For example, if the property in the square with the highest risk is 3-5%, the whole grid square will have a risk of 3-5%. However, there may be only one property in that square with that level of risk.
- More detailed information is also available from PHE identifying the highest risk of any property within a particular postcode. This can potentially reduce the number of properties that need testing.
- 1.4 **Radon Affected Areas:** PHE defines a Radon Affected Area as anywhere where the risk of a property exceeding the Action Level is greater than 1%. PHE recommends that radon is measured in all properties in Radon Affected Areas.
- 1.5 **New build properties:** Since 2012, all new build properties in Radon Affected Areas must be protected from radon to comply with building regulations.
- 1.5 **Measuring radon levels:** Radon levels are measured by placing radon detectors in the areas of a property where the occupants spend most time – typically a living room and bedroom – for a period of three months. This reduces the chance that short-term variations in the radon level will affect the result.

2.0 Radon Register

- 2.1 Albyn maintains a Radon Register to monitor the risk level of each asset, and any testing or remedial action carried out.
- The Register lists all assets on Albyn's UH system and whether we have a duty to assess and manage the risk of radon for that asset.
- Where we have such a duty, the Register records the risk that the asset's radon levels are above the Action Level, the results of any testing, any remedial action taken, and the results of testing carried out following remedial work.

3.0 Albyn's approach

3.1 There are six stages to our approach:

- Identify properties for which we have a duty to ensure radon levels are safe
- Assess the risk that radon in those properties is above the Action Level
- Test the radon levels of properties in Radon Affected Areas
- Take remedial action to reduce radon in properties above the Action Level
- Retest properties following the completion of remedial action
- Retest radon levels in properties in Radon Affected Areas at appropriate intervals.

4.0 Stage 1: Identifying properties

4.1 As an employer and landlord, Albyn has a legal duty of care towards our employees, our tenants, and other customers.

We will assess the risk from radon, and – where appropriate – measure radon levels and take further action – in the following types of property:

- Rented homes that are owned by Albyn
- HMOs and shared accommodation owned by Albyn
- Workspaces owned by Albyn (except garages)

We will assess the risk from radon and – where appropriate – refer properties back to the property owner for testing and any remedial action – in the following types of property:

- Rented homes owned by another landlord but managed by Albyn
- HMOs and shared accommodation owned by another landlord but managed by Albyn
- Workspaces owned by another landlord but managed by Albyn

We will not assess radon risk in the following property types unless the contract with the owner, or our duty to another resident, requires us to do so:

- Owner occupied properties
- Shared ownership and shared equity properties
- Internal common areas of flat blocks
- Garages.

4.2 In April each year, the Asset and Investment Assistant will update the Register to take account of any new assets acquired, disposals, and changes in usage, and whether the change has any effect on our duty to manage radon for that asset.

5.0 Stage 2: Assessing radon risk

5.1 We have identified the radon risk level of all our relevant assets using the free PHE Radon Map, PHE postcode data and PHE individual property data. This data is held in the Radon Register.

5.2 The importance of obtaining good quality risk data cannot be understated.

The free data overstates risk for many properties: the true risk will be the same or lower. If the radon risk of a property is 0-1%, the property does not need to be individually tested. It is therefore important to eliminate low risk properties from the testing programme to save money on unnecessary testing. For this reason, we will almost always acquire data beyond the free data.

- 5.3 In April every fifth year (from 2020), the Asset and Investment Assistant will (after completing 4.2), review the risk levels of all stock for which Albyn Group is responsible for managing the risk from radon.
- 5.5 When reviewing risk levels, the Asset and Investment Assistant will:
- Obtain free PHE risk data for all properties where Albyn is responsible for risk;
 - Where the radon risk from the free data is over 1%, obtain updated PHE postcode data (where this is considered cost-effective);
 - Where the radon risk from the postcode data is over 1%, obtain individual property data (where this is considered to be cost-effective).
- Note that property data will not be acquired for properties that have been tested and where the most recent test result was over 100 Bq/m³.
- 5.6 The radon register will be updated with the new risk ratings, and the date that the risk was reviewed (even if the risk is unchanged).
- 5.7 The reviewed testing programme will include all properties where Albyn Group is responsible for the management of radon at that property, and *either*:
- The asset has a risk rating of 1% or higher, *or*
 - The asset has previously been tested and the result was over 100 Bq/m³.

6.0 Stage 3: First testing of radon levels

- 6.1 Where a property is in a Radon Affected Area (ie the radon risk is over 1%), and we are responsible for any testing and remedial action (see 4.1), we will measure the actual radon levels in that property subject to the following:
- New build properties in Radon Affected Areas will be tested within two years of handover.
 - Properties will be prioritised for testing based on the level of radon risk.
 - Upper floor flats will not be tested unless they are above a property that we do not own or manage, as any testing and remedial action for the ground floor flat will identify and resolve any issues in the upper floor flat(s).
 - Properties owned by a third party (for example, if we manage the property on behalf of the owner), will be referred back to the property owner for testing and any remedial action.

Properties that are not in Radon Affected Areas will not be tested unless they have previously been tested *and* the last test result was over 100 Bq/m³.

- 6.2 When testing, it is important that detectors are placed correctly, are left for the right period of time, and are removed and sent for analysis promptly at the end of the testing period. For this reason, it is preferable to test small groups of properties in one geographical area.

6.3 **Obtaining Detectors:** Radon detectors are purchased from Track Analysis Systems Ltd (TASL) by purchase order.

Radon detectors must be stored correctly and used within specific timescales:

- For standard three month tests: Detectors must be stored in a freezer and placed on site within three months of receipt
- For seven day tests (usually used following remedial action): Detectors must be stored in a freezer and placed on site within one month of receipt.

Where detectors cannot be stored in a freezer, they must be placed on site as soon as they are received. Therefore:

- Detectors must **only** be ordered where there is freezer storage available;
- Detectors should be ordered a month before the on-site installation appointment. Once received, they must be stored as set out above;
- **We will place all detectors on site within one month of receipt.**

6.4 **Installing the Detectors:** Once a property list has been identified for a testing phase, the tenants will be sent **Letter RADON1** and **Leaflet RADON2**. An officer will visit the property on the appointed date to install the detectors.

Where the property is managed by HRI, the Asset and Investment Assistant will liaise with HRI on communication with the tenant and installation of detectors.

Detectors will be placed in the main living room and bedroom in locations that are:

- Between 100cm and 150 cm from the floor;
- Away from sources of heat such as radiators, stoves or direct sunlight;
- Away from sources of fresh air such as doors or windows;
- In the open room (ie not in a drawer or other enclosed space);
- Out of reach of any children or pets in the property;
- Unlikely to be disturbed during the three month testing period.

The date of installation should be noted in the radon register.

6.5 **Removing the Detectors:** Detectors will be removed 3 months after installation. The tenant will be contacted by letter or phoned to arrange an appointment (see **Letter RADON 3** if required). An officer will visit the property on the appointed date to remove the detectors.

Detectors should be removed carefully to avoid causing any damage. The date of removal should be noted in the Radon Register, along with details of any detectors that have been lost, tampered with, or otherwise invalidated.

6.6 **No Access:** Where no access is given to remove the detectors, we will attempt to make contact with the tenant within one working day to arrange access.

6.7 **Analysis:** Analysis of detectors is carried out by TASL.

Once detectors have been removed from a location, they must be stored in line with TASL guidance and then sent for analysis – along with the TASL summary sheet – within one working day.

6.8 **Recording Analysis Results:** When the test results are received, the Asset and Investment Assistant will enter them into the Radon Register and:

- Where the measurement is below 200 Bq/m³, the tenant will be sent **Letter RADON4**.
- Where the measurement is 200 Bq/m³ or higher, the tenant will be sent **Letter RADON5** and the property identified are requiring remedial action.

Where the property is managed by HRI, the Asset and Investment Assistant will liaise with HRI on communication with the tenant and any remedial action required.

7.0 Stage 4: Taking remedial action

7.1 Remedial action is taken where the radon level is 200 Bq/m³ or higher.

Albyn aims to carry out remedial action within two years of receiving the analysis results. However, where there are multiple properties requiring remedial action, properties will be prioritised based on the level of radon detected.

7.2 Where remedial action is required, a folder for the property will be set up in the Remedial Action section of the Radon directory to hold all records and emails related to the action, and **Summary RADON6** will be set up in the property folder.

7.3 PHE recommends the following options for reducing radon levels:

- **Solid floors – over 500 Bq/m³:** Radon sump
- **Solid floors – under 500 Bq/m³:** Radon sump or positive ventilation
- **Suspended floors – over 500 Bq/m³:** Mechanical under-floor ventilation or natural under-floor ventilation
- **Suspended floors – under 500 Bq/m³:** Natural under-floor ventilation or positive ventilation

Further details of each option can be found on the Public Health England website: <https://www.ukradon.org/information/reducelevels>

7.4 A tender will be placed on Public Contracts Scotland asking for proposals for reducing the level of radon in the property to below 100 Bq/m³. The tender will state that payment for the work will be within 28 days of receipt of a correct invoice (shorter payment terms will not be accepted). This is to enable a seven day radon test to be carried out following remedial action but before payment is made. **For this reason, as remedial work is coming to an end, a radon test kit should be ordered.** The tender will also state that the radon reading following remedial action must be below 150 Bq/m³.

7.5 A suitable contractor will be identified in the usual way, and the work go ahead, liaising with the tenant as appropriate.

7.6 The contractor will not normally be paid for remedial work until a seven day test has demonstrated that the work has achieved a satisfactory reduction in the radon levels in the property (see below).

8.0 Stage 5: Retesting radon levels after remedial action

- 8.1 Where any form of remedial action has been installed, a seven day radon test will be started within one week of the work being completed, to ensure that radon levels have fallen to the required level before the invoice for the work is paid. Details of the test will be recorded in the Radon Register as outlined at section 6.
- 8.2 The invoice for the remedial work will not be paid until the results of that test have been received and show a reading below 150 Bq/m³ *unless*:
- The tenant repeatedly fails to give access for the test, or
 - The tenant repeatedly tampers with the detectors, or
 - There are significant delays obtaining either detectors or results.
- However, it is expected that in virtually all cases, the seven day test will be completed before payment.**
- The result of the seven day test will be recorded in the Radon Register.
- 8.3 Where the seven day test shows a reading over 150 Bq/m³, we will liaise with the contractor, who will be expected to remedy the situation before being paid.
- 8.4 Where the new test results in a reading of over 199 Bq/m³, further action will be required to reduce the radon level.

9.0 Stage 6: Retesting properties

- 9.1 Properties will be retested as follows:
- Properties in Radon Affected Areas with the last test below 100 Bq/m³ will be retested within ten years.
 - Properties in Radon Affected Areas with the last test 100-199 Bq/m³ will be retested within seven years.
 - Properties *not* in Radon Affected Areas but which have previously been tested *and* the last test was over 99 Bq/m³ will be tested within seven years.
- The last test relates to the most recent test results for the property.
- 9.2 Following retesting, any remedial work identified will be undertaken as outlined in section 7.

Date

Name

Add

Add

Add

Dear

IMPORTANT: Radon Testing Programme

I am writing to let you know about a radon testing programme that Albyn will be carrying out this year. Radon is a naturally occurring gas that we are all exposed to daily. However, in some areas of Scotland, the radon in individual homes can rise above the recommended level. We test properties in those areas to ensure that residents in our homes remain safe.

How will my home be tested?

We use a simple test to assess radon levels. Two small detectors will be placed in your home: one in the main living area and the other in the main bedroom. The detectors are around 5cm in size and are attached to the wall. The detectors must be left in place for three months. We then collect them and send them to a laboratory for analysis.

When will the test be happening?

We would like to visit your home to install detectors on:

Friday 31st February 2020 in the morning

If you would like to arrange a specific time for us to visit, please contact me, and we will try to accommodate your request. If you cannot be at home, it would be helpful if you could arrange for someone to be present, or you may wish to leave a key with a neighbour.

What happens after testing?

Once we get the test results from the laboratory, we will assess whether we need to do any remedial work to reduce radon levels your home. We will write to let you know the outcome.

If you have any questions about radon or the testing programme, please get in touch.

Yours sincerely

Helen Sellers

Asset and Investment Assistant

Email: helen.sellers@albynhousing.org.uk

Mobile: 07764 145621

Your radon test – what's it all about?

Albyn is planning to test the level of radon in your home. This leaflet answers some common questions that people have about radon tests.

1	What is radon? Radon is a radioactive gas that you cannot see or smell. It comes from rocks and soil, and is present everywhere in the UK. Some areas of the UK have higher radon levels than others. In these areas, radon levels in some homes can rise above the Government's recommended levels.
2	Why is my home being tested? Your home is in an area where the natural level of radon is higher than average. We want to test your home to ensure that the radon there is within safe limits set by the Government. It is important to remember that, even in 'higher risk' areas, most homes will have safe levels of radon.
3	How do the detectors work? The detectors measure radon over a period of time. To get the most accurate reading, they will be placed: • Away from heat (such as radiators or direct sunlight) • Away from fresh air (such as windows or doors) • In the open (so not in a drawer or behind furniture)
4	What happens then? We will collect the detectors after around three months and send them to a laboratory for analysis. We will let you know the outcome of the test, and if we need to take any further action. From time to time, the test results are unclear, so there is a small chance we will need to do a further test.
5	What do I need to do? To make sure we get an accurate measurement of the radon in your home, please: • Don't move the detectors • Don't fiddle with the detectors • Keep children and animals away from the detectors

Date

Name
Address
Address
Address

Dear

RADON TESTING

As you know, around three months ago we installed radon detectors in your home. It is now time for us to collect them.

We will be visiting your area on:

Friday 31st February 2099 from around 11am

We will be in the area from about 11.00am and would be grateful if you could arrange for someone to be present so we can collect your detectors. The visit should only take about 5 minutes.

If you would like to arrange a specific time for us to call at your home, please contact me and we will try to accommodate your request. If you cannot be at home, it would be very helpful if you could arrange for someone else to be present, or you may wish to leave a key with your neighbour.

If you have any questions about radon or the testing, please get in touch using the contact details below.

Yours sincerely,

Helen Sellers
Asset and Investment Assistant
Email: helen.sellers@albynhousing.org.uk
Phone: 07764 145621

Date

Name
Address
Address
Address

Dear

RESULTS OF RADON TESTING

As you know, we recently carried out radon testing at your home. The detectors were sent off to the laboratory and have now been analysed.

I am pleased to be able to inform you that the levels of radon in your home are within the safe levels set by the Government. This means that we do not need to carry out any work to your home.

If you have any questions about radon or the testing, please get in touch using the contact details below and we will be happy to help.

Yours sincerely,

Helen Sellers
Asset and Investment Assistant
Email: helen.sellers@albynhousing.org.uk
Mobile: 07764 145621

Date

Name
Address
Address
Address

Dear

RADON TESTING RESULTS

As you know, we recently carried out radon testing at your home. The detectors were sent off to the laboratory and have now been analysed.

The results show that the radon level in your home is slightly higher than the recommended level set by the Government. This means that we need to carry out remedial action to improve ventilation in your home and reduce the level of radon.

We have instructed **CONTRACTOR** to survey your home to identify the most suitable form of work to resolve the issue. They will be in contact with you shortly to arrange an appointment to visit you.

Once we have received a report from **CONTRACTOR**, we will be in touch with you again to give you more information about the works that will be required.

If you have any questions, please get in touch using the contact details below and we will be happy to help.

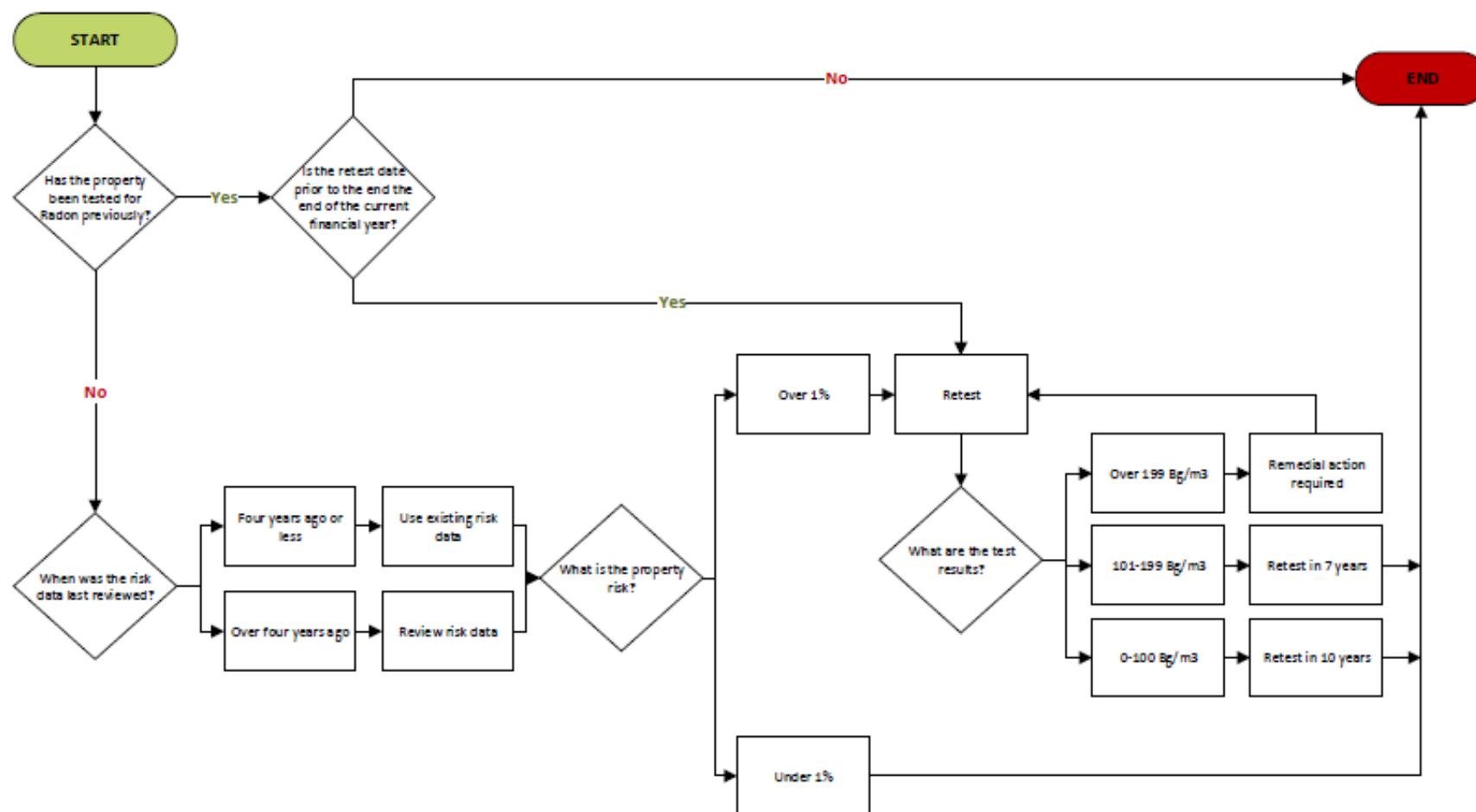
Yours sincerely,

Helen Sellers
Asset and Investment Assistant
Email: helen.sellers@albynhousing.org.uk
Mobile: 07764 145621

Summary of Radon Remedial Action

[illegible]

Radon Workflow



Client Albyn Housing Society Ltd	Page 1 of 1	Prepared by Helen Sellers	Date 12/11/2020	DRAWN BY MAIRI GILMOUR
Process Radon Testing Process		Approved by Mona Beers	Date TBC	