

Radon Safety Policy

Housing Assets

August 2023

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1 Introduction

- 1.1 Radon is a naturally occurring radioactive gas that originates from the decay of uranium in rocks and soils. It is colourless, odourless and tasteless. Exposure to elevated levels of radon for prolonged periods increases the risk of developing lung cancer.
- 1.2 As a responsible social landlord, Canterbury City Council (CCC) takes the health risks from radon gas seriously. This policy sets out our approach to identifying and mitigating radon hazards within our housing stock to protect the health and safety of tenants.

2 Scope

- 2.1 This policy applies to all domestic housing properties owned and managed by CCC across the district.
- 2.2 The policy encompasses:
- 2.3 Identification of Properties at Risk - Using government radon maps and property attributes like age, construction type and geography to categorise homes into higher and lower radon risk to guide testing priorities.
- 2.4 Initial Radon Measurement - Deploying passive radon detectors in identified at-risk properties and analysing results to quantify radon levels in Becquerels per cubic metre (Bq/m³).
- 2.5 Remedial Action - Where initial results exceed the UK Action Level of 200 Bq/m³, installing appropriate remediation solutions depending on the construction method, such as underfloor ventilation, sump systems, or membrane barriers.
- 2.6 Post-Installation Validation - Carrying out follow up radon measurements after remediation to verify reduction to acceptable levels below 200 Bq/m³.
- 2.7 Ongoing Monitoring - Periodic longer-term radon screening to confirm continued safe levels especially where initial readings were borderline or in very high radiation areas.
- 2.8 Record Keeping - Maintaining a register of all test results, properties exceeding the Action Level, details of remediation undertaken, and follow-up confirmatory testing.
- 2.9 Tenant Communication - Providing tenants with transparent information on radon risks, the testing/remediation process, and how exposure is minimised.

3 Legislation, Approved Codes of Practice and Industry Guidance

- 3.1 It is CCC's policy to comply with all relevant legislation, Approved Codes of Practice and Industry Guidance on radon safety, where applicable. This includes:
- 3.2 Regulatory Standards - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which was introduced by the Regulator of Social Housing (RSH) in April 2012.
- 3.3 Ionising Radiations Regulations 2017 These regulations enforced by the HSE set out radon exposure limits for homes (200 Bq/m³), workplaces (300 Bq/m³) and schools (200 Bq/m³). They require notification of radon levels above the action levels.
- 3.4 UK Radon Affected Areas Maps These maps defined by Public Health England categorise areas into lower and higher radon potential based on underlying geology to guide testing strategy.
- 3.5 Public Health England (PHE) Guidance PHE provides authoritative guidance on all aspects of radon measurement, interpretation of results and remediation approaches for high readings.
- 3.6 Housing Health and Safety Rating System (HHSRS) The HHSRS assessment schedules cover radon as a Category 1 hazard and detail the evaluation process for determining severity.
- 3.7 Housing Act 2004 Places a statutory duty on social landlords to ensure properties are free of hazards, including radon.
- 3.8 Building Regulations Part C Details radon protective measures required for new buildings in higher risk areas. Sets out requirements for membranes, sumps etc.
- 3.9 ISO 11665 Series Standards Define the international standard procedures for measuring radon in air and water, placement and analysis of passive radon detectors.
- 3.10 Sanctions – CCC acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice, and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health and Safety Executive under the Health and Safety at Work etc Act 1974, prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.
- 3.11 Tenants – CCC will use the legal remedies available within the terms of the tenancy agreement should any tenant refuse access to carry out essential radon safety related inspection and remediation works.

- 3.12 HRA Commercial Stock – CCC will use the legal remedies available within the terms of the lease agreement should any leaseholder or shared owner refuse permission and/or access to carry out essential radon safety related inspection and remediation works.

4 Obligations

- 4.1 To protect tenant health and minimise radon hazards, CCC will undertake the following:
- 4.2 Review radon maps and housing stock data to identify properties requiring testing based on location, age, construction type and footprint.
- 4.3 Develop a dynamic multi-year testing plan informed by property risk profiling and previous screening results.
- 4.4 Deploy passive radon detectors in designated homes according to best practice for optimal placement and duration.
- 4.5 Retrieve and analyse detectors at accredited laboratories to quantify radon levels in Becquerels/m³.
- 4.6 Install appropriate remediation solutions like underfloor ventilation, sump and membrane systems where levels exceed 200 Bq/m³.
- 4.7 Conduct rigorous post-remediation validation testing over 3 months during winter to confirm radon reduction.
- 4.8 Perform further investigative measurements if validation results remain elevated.
- 4.9 Carry out ongoing periodic long-term monitoring every 5-10 years to identify any new issues.
- 4.10 Review test records to identify geographical radon hotspots requiring more frequent screening.
- 4.11 Maintain a comprehensive register of all properties tested, results, mitigation details and confirmation testing.
- 4.12 Report any readings above the HSE notification levels to Public Health England as required.
- 4.13 Provide tenants with transparent communication on risks, testing schedules, results and mitigation works.
- 4.14 Ensure internal teams and external contractors follow proper radon measurement and installation protocols.
- 4.15 Continually evaluate technological developments in radon prevention and detection solutions.

5 Statement of Intent

- 5.1 CCC is fully committed to taking proportionate action to identify and minimise exposure to indoor radon across our housing stock. CCC will adopt a systematic risk-based approach to testing and mitigation.
- 5.2 Our aim is to proactively manage radon to ensure levels remain below 200 Bq/m³ in all CCC homes to protect tenants from exposure risks. We will utilise all available information, resources and partnerships to identify and resolve potential issues.
- 5.3 CCC will focus efforts on properties identified as higher risk. But we will also periodically sample test low-risk homes to confirm assumptions. Postcode mapping alone does not indicate actual radon presence.
- 5.4 We will act promptly to install suitable preventative measures in homes found to exceed the UK Action Level based on robust initial measurement. The specific remediation solution will be tailored to the building construction type.
- 5.5 Tenant health and safety is our utmost priority. CCC will provide transparent communication and work sensitively with affected residents throughout the identification, remediation and ongoing monitoring processes.
- 5.6 We are committed to continuous improvement in radon control. CCC will stay abreast of technological advancements in testing equipment, real-time monitoring and protective solutions to enhance our approach.
- 5.7 Through implementation of this policy, CCC will demonstrate environmentally responsible housing management and fulfil our obligations to minimise radon's public health impact.

6 Key Roles and Responsibilities

- 6.1 Overall responsibility for health and safety and the policy within Canterbury City Council lies with the joint Chief Executives, with support from the Service Director, People and Service Director for Place. These four officers make up the Corporate Leadership Team.
- 6.2 Responsibility for ensuring this policy is being carried out lies with the Extended Management Team for all areas under their direct control. The Extended Management Team will ensure an appropriate system of communication is in place whereby all significant accidents, incidents, audits, reviews or other documents relating to the management of the organisation are brought to the attention of the Director of Corporate Services at the earliest opportunity.
- 6.3 CCC's Head of Facilities Management as part of the Extended Management Team will have overall governance responsibility for

ensuring the Radon Safety Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice.

- 6.4 CCC's Head of Facilities Management as part of the Extended Management Team will receive regular updates on the implementation of the Radon Safety Policy and radon safety performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.
- 6.5 CCC's Head of Facilities Management will ensure that this policy is saved on the organisations' shared drive/site for corporate health and safety and distributed to all relevant members of staff.
- 6.6 CCC's Lead Compliance and Building Safety Manager has strategic responsibility for the management of radon safety and for ensuring compliance is achieved and maintained. They will also oversee the implementation of the Radon Safety Policy and review it every three years (or sooner if there is a change in regulation, legislation or codes of practice or for other reasons specified with legislation). They will notify the Head of Facilities Management and relevant operational team(s) responsible for the delivery of the compliance programme, of the upcoming review.
- 6.7 A combined group will be responsible for overseeing the operational delivery of the agreed radon safety programme, and the prioritisation and implementation of any works arising from the radon safety risk assessments. This group will include Contract Managers, Compliance Officers, Works Delivery Team Leaders, Case Officers and Case Team Leaders.
- 6.8 Various departments under the joint Chief Executives provide key support in gaining access into properties where access is proving difficult, and use standard methods to do so. They will also support in facilitating the legal process to gain access as necessary.

7 Additional Legislation and Industry Standards

- 7.1 This radon safety policy also operates in the context of the following additional legislation:
 - 7.1.1 Housing Act 2004
 - 7.1.2 Health and Safety at Work etc Act 1974
 - 7.1.3 The Management of Health and Safety at Work Regulations 1999
 - 7.1.4 Management of Houses in Multiple Occupation (England) Regulations 2006
 - 7.1.5 Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006

- 7.1.6 The Health and Safety (Safety Signs and Signals) Regulations 1996
- 7.1.7 The Building Regulations 2000: Approved Document B Fire Safety
- 7.1.8 Construction (Design and Management) Regulations 2015
- 7.1.9 Data Protection Act 2018
- 7.1.10 Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013
- 7.1.11 Homes (Fitness for Human Habitation) Act 2018

8 Approval

8.1 Signature

8.2 Name Marie Royle

8.3 Position Services Director

8.4 Date Signed 23rd April 2025

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