



## INTERNAL AUDIT REPORT

**FROM:** Audit and Risk Manager

**TO:** Head of Housing  
Head of Neighbourhood and Assets

**C.C.:** Chief Executive  
Deputy Chief Executive  
Head of Finance  
Building Safety Lead  
Fire Safety Lead  
Portfolio Holder (Cllr P Wightman)

**SUBJECT:** Fire Safety and Prevention Contracts

**DATE:** 28 May 2024

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### 1 Introduction

- 1.1 In accordance with the Audit Plan for 2023/24, an examination of the above subject area has recently been completed by Ian Davy, Principal Internal Auditor, and this report presents the findings and conclusions for information and, where appropriate, action.
- 1.2 Wherever possible, findings have been discussed with the staff involved in the procedures examined and their views are incorporated, where appropriate, into the report. My thanks are extended to all concerned for the help and cooperation received during the audit.

### 2 Background

- 2.1 Fire safety and prevention in Council-owned properties has been given an extremely high profile in recent years following the fire at Grenfell, with new regulations being introduced (Fire Safety (England) Regulations 2022).
- 2.2 The Council has seven high rise blocks at Eden Court, Ashton Court, Christine Ledger Square, Radcliffe Gardens, Stamford Gardens and Westbrook House. There are also a number of medium and low-rise blocks where the Council needs to undertake fire risk assessments of the communal areas.
- 2.3 The audit was undertaken at a time of change, with some of the processes in place at the start of the audit being amended during the fieldwork stage. The report reflects these changes where relevant. There have also been staff changes in relevant posts during the audit, with further changes on the horizon.
- 2.4 There have previously been wide-ranging audits of Housing Investment and Maintenance Programmes. During the planning round for the 2023/24 audits, it was felt that the Fire Safety and Prevention Contracts and the Decarbonisation and Fuel Poverty work contracts could be split into their own, discrete, audits,

with this being the first of those discrete audits. However, it has subsequently been agreed that these will be recombined into the one audit.

### **3 Objectives of the Audit and Coverage of Risks**

- 3.1 The management and financial controls in place have been assessed to provide assurance that the risks are being managed effectively. It should be noted that the risks stated in the report do not represent audit findings in themselves, but rather express the potential for a particular risk to occur. The findings detailed in each section following the stated risk confirm whether the risk is being controlled appropriately or whether there have been issues identified that need to be addressed.
- 3.2 In terms of scope, the audit covered the following risks:
1. Insufficient budget to undertake all of the works required as identified during Fire Risk Assessments and the reviews of fire doors.
  2. Inappropriate procurement of contracts.
  3. Failure to meet the requirements of the Fire Safety (England) Regulations 2022 in line with specified timeframes.
  4. Adverse publicity as a result of a fire in a block of flats or failure to undertake fire safety works.
  5. Vulnerable residents are required to decant due to unsafe properties.
  6. Contractors claiming for works not undertaken due to lack of contract management / review of works.
  7. Fire Risk Assessments are out of date or do not pick up all relevant risks.
  8. Works required are missed when reviewing the Fire Risk Assessments.
  9. Work programmes are ineffective / do not address the highest risks in a timely manner.
  10. Contractor capacity to undertake all required works is insufficient.
  11. Internal staffing resources insufficient to deal with fire door reviews and / or reviewing Fire Risk Assessments and placing works orders.
  12. Fire Risk Assessments cannot be accessed or updated due to use of AssessNet.
  13. Loss of experience due to re-procurement of the contracts and moving the Fire Risk Assessments from Building Control.
- 3.3 These were identified during discussion between the Principal Internal Auditor and the key contacts for the audit, covering both Housing, and Neighbourhood and Assets.
- 3.4 The work in this area will help to meet the 'top level' external strands of the Business Strategy 2020-23 with regards to the home's aspect of Health, Homes and Communities, and the Safe aspect of Green, Clean and Safe.
- 3.5 Whilst this audit touched on certain, compliance, aspects, a separate Fire Safety Compliance audit is also included on the Strategic Audit Plan.

## 4 Findings

### 4.1 Recommendations from Previous Reports

4.1.1 This section is not applicable as this is the first discrete audit of this subject.

### 4.2 Financial Risks

#### 4.2.1 **Potential Risk: Insufficient budget to undertake all of the works required as identified during Fire Risk Assessments.**

The Principal Building Surveyor (Fire Safety and Climate Change) (PBS) advised that the budgets for the fire risk improvement works had been set some time ago through the Technical Manager in Assets. This was initially set at £3m per annum for ten years although this was an indicative figure whilst a full budget profile was being compiled.

The PBS suggested that the Head of Housing and the Head of Neighbourhood and Assets have indicated that the money will be found as the works need doing with the costs expected to far exceed the initial budget set.

The PBS advised that whilst the initial plans were for a long-term programme, the intention was now to get 'critical' works undertaken quickly with the 'lesser' priority works completed later. However, there has been a delay in the start of the high rise works, with the anticipated planned start date for the first block (Westbrook House) being delayed from pre-Christmas 2023 to July 2024 at the earliest, subject to the consent from the Building Safety Regulator and the award of an appropriate contract (see 4.2.2 below).

There are approximately 300 properties that need to be worked on with the anticipated costs being based on the costs to date of the sites worked on so far, although these have tended to be the bigger properties.

He also highlighted that he had been looking at awarding a £1m contract extension so that the contractor working on the sheltered schemes (Seddon) can undertake works on another block, although the procurement options are being reviewed (see 4.2.2 below).

The PBS advised that the contracts that he is dealing with are all measured terms for a specified amount. The contractors are submitting standard monthly invoices to cover the total cost of the work over a set number of months, irrespective of how much work has been completed in those months. He suggested that there had been issues with previous contractors submitting invoices for valuation-based invoices which led to issues with the final accounts when the works were checked.

That being said, there is still a need for financial control to be exercised, so the cost of the work undertaken should be reviewed against the budget and measured cost 'prices' for each piece of work to ensure that there are no unexpected variations presented at the end of the works, with money also being held aside as a contingency should such issues arise.

## **Recommendation**

**Monthly cost figures should be provided and reviewed against budget to ensure that the overall cost and budget are still in line with the agreed prices.**

There is a spreadsheet in place on which all of the FRA actions identified by Pennington's are recorded which is where the 'other' works are drawn from, although it was highlighted that not all of these works fall under the direct control of the PBS (e.g. waste clearance from premises).

### **4.2.2 Potential Risk: Inappropriate procurement of contracts.**

The PBS advised that the contracts with Wates (for high rise properties) and Seddon (sheltered schemes and other works) were initially to be let through direct awards off the Fusion 21 framework although, due to the time it took to get the Wates contract in place, this was actually let through another appropriate framework (CHIC).

He suggested that the top-rated company on the (Fusion 21) framework mainly works in the northeast and was not interested in the works, so the contracts were awarded to numbers two and three on the list. Originally, this was to be for £1.5m over 9 months plus £1m each in slippage from the previous 'schemes.

Wates were awarded the high rise / high risk contract which is now valued at roughly £13m with Seddon getting the fire door / fire stopping contract for sheltered schemes worth approximately £3m. DocuSigned copies of these contracts were found to be in place on Ci Anywhere (Finance management system) during the testing undertaken.

The PBS highlighted that the split of works was based on the fact that, of the two contractors, only Wates could undertake the cladding works required at the high-rise properties. However, Wates are still at the pre-construction stage of the works and plans to award them the first construction contract order were currently on hold as the Health and Safety and Premises Manager (HSPM) and the then Fire Safety Lead (FSL) (who has now left the Council) required Wates to prove their competency to undertake the required works (i.e. provide evidence of their experience, qualifications etc. as well as providing the same details for any of their subcontractors). Upon discussion of the draft report, the Building Safety Lead (BSL) and the new FSL have confirmed that Wates and their subcontractors have the required competencies in order for the contract situation to be passed through to Procurement, prior to sign off by the Regulator.

The PBS suggested that new contracts would be needed, and these would go down the 'gateway' and open tender route rather than a direct award, with the FSL suggesting that direct award route would not be supported as the control measures in place would allow time for a formal tender. He suggested that there was also the potential to use some of our other existing contractors to pick up some of the works to get the works completed sooner, subject to there being funds made available.

The Procurement Business Partner advised that there are discussions currently about the work that is needed moving forward and how to procure this, i.e. whether a short-term direct award is viable, with the look to procure a wider long-term contract.

Further detail was to be provided on exactly what the work would be to see what would be procured via direct award.

The framework options had been discussed with the HSPM and the FSL to check for compliance against health and safety requirements (although this would mainly fall under contract management). It would still leave the need to undertake a competitive procurement exercise for the wider long-term contract.

### **Recommendation**

**The ongoing contract situation should be resolved as soon as possible to ensure that these high-profile works are completed in a timely manner, with the contracts reflecting the agreed ways of working going forward and compliance with relevant regulations.**

The PBS advised that there were no KPIs in either of the current contracts although some 'standard' ones had now been pulled together. However, these had not been applied to the current contracts, largely down to the fact that they were let on measured term contracts, with no retention or liquidated damages clauses.

### **Recommendation**

**It should be ensured that appropriate KPIs are included in all relevant contracts let in the future.**

## **4.3 Legal and Regulatory Risks**

### **4.3.1 Potential Risk: Failure to meet the requirements of the Fire Safety (England) Regulations 2022 in line with specified timeframes.**

As well as the main 'regulatory' risk, the BSL highlighted that relevant regulators (Health and Safety Executive, Social Housing Regulator etc.) and 'no win, no fee' solicitors representing residents had the potential to undertake unannounced inspections to ensure that fire safety risks had been assessed and addressed.

The PBS advised that the Landlord Services Manager had originally provided him with a list of relevant properties (i.e. those that require an FRA to be performed), as he was unsure how to run one off Active H. Access was provided to a spreadsheet in place that includes all of the relevant properties.

An FRA Actions spreadsheet is also in place which summarises all of the actions required as set out on the individual Fire Risk Assessments (FRA) for residential properties, although it was identified that the latest FRAs for the high-rise blocks, performed in October & November 2023 were not reflected (see 4.6.1 below). There is also a 'status update' spreadsheet that shows all relevant

blocks and cross-references to the actions spreadsheet to identify whether there are any FRAs / actions in place.

The 'status' spreadsheet identified a number of properties where there were apparently no FRAs or actions in place. The PBS suggested that he was aware that a number of properties had been missed which had not had an FRA undertaken and others were new builds.

### **Recommendation**

**It should be ensured that all relevant properties have had a fire risk assessment performed.**

Testing was undertaken to verify whether the information regarding the properties that had apparently not had an FRA performed was correct to ascertain whether any of the required works had been missed. Upon review of the FRAs held, four of the 35 sampled properties were found to have had FRAs performed.

In two cases the 'lookup' function had failed on the status update spreadsheet as the asset ID on the Combined Actions spreadsheet included additional characters. In these cases, the works required were included as appropriate on the Combined Actions spreadsheet.

However, in the other two cases, the actions identified on the FRA were not included on the combined actions spreadsheet.

### **Recommendation**

**It should be ensured that all actions identified on the FRAs performed are recorded on the actions spreadsheet to ensure works are performed as required.**

The PBS highlighted that, where properties are sold under Right to Buy, the communal areas would still be the responsibility of the Council, so would not need to be removed from the list (as the regulations do not apply to individual properties).

The PBS advised that the individual works had not been programmed as such, with all of the relevant works initially being picked up when the specific blocks are being worked on. However, this is likely to change in the future, with the high priority actions being addressed first. Internal Audit agree that this approach is more appropriate.

The Combined Actions spreadsheet was checked to the individual FRAs held on the network to ensure that all relevant works were included (NB – where high rise properties were selected as part of the sample, the check was to the old FRA as it had been identified that the latest ones were not reflected on the actions spreadsheet – see above).

The testing confirmed that all actions identified on the FRAs for the sampled properties had been picked up accordingly.

#### 4.4 **Reputational Risks**

##### 4.4.1 **Potential Risk: Adverse publicity as a result of a fire in a block of flats or failure to undertake fire safety works.**

The testing for this risk was covered as part of the work on the Health, Safety and Wellbeing risks, set out at 4.6 below.

##### 4.4.2 **Potential Risk: Vulnerable residents are required to decant due to unsafe properties.**

The PBS advised that, whenever work is to be undertaken, letters will be sent to the affected tenants. There have also been open days held at sheltered schemes (including Lifeline staff) and Seddon have a tenant liaison manager available to answer queries.

A letter regarding the Housing Compliance audit, undertaken by Pennington's (which covers FRAs amongst other things), has also been sent to all tenants to advise them of the results and the steps being taken to address the findings.

#### 4.5 **Fraud Risks**

##### 4.5.1 **Potential Risk: Contractors claiming for works not undertaken due to lack of contract management / review of works.**

The PBS advised that regular meetings are held with the two main contractors. Meetings with Seddon are held on a monthly basis, with fortnightly updates from Wates who are not yet at the stage where performance monitoring is required (pre-construction phase).

The results of these meetings and performance on the works as a whole is included in the RAG reports that are produced each month. Sample copies of these reports were provided which confirmed that this is being undertaken.

As highlighted previously, invoices from the current contractors are (generally) based on a split of the total cost of works, irrespective of how much work has been completed with the specific month. A review of the Ci Anywhere system and the supporting documents confirmed this to be the case, although there was an additional, one-off, invoice for the works to Sayer Court.

#### 4.6 **Health, Safety and Wellbeing Risks**

##### 4.6.1 **Potential Risk: Fire Risk Assessments are out of date or do not pick up all relevant risks.**

The PBS advised that FRAs should be reviewed on a regular basis, with the frequency dependent on the severity of the findings (either 12, 24 or 36 months). This is now set out in the Fire Safety Policy, written by the HSPM.

There had been no suitably qualified 'competent persons' at the Council until the HSPM joined. Building Control had previously undertaken the work but were no longer able to do so.

Consideration had been given to employing someone through an agency to do the work, but there were queries over the level of insurance that would be required, so it was suggested that this should stay as a third-party contract.

As indicated above, the FRA Combined Actions spreadsheet was said to cover all of the FRAs performed and the associated works required, although it was identified that some, more recent, assessments had been undertaken at the high-rise properties and these were not reflected on the spreadsheet (all of the high-rise actions detailed on the spreadsheet were from assessments performed in April 2022).

### **Recommendation**

**It should be ensured that the actions spreadsheet includes actions identified from the most recent assessments performed.**

The HSPM highlighted that there is nothing set out in legislation as to the timescales for when the works need to be undertaken, with it being up to a 'competent Fire Risk Assessor' to decide and, as such, the timescales suggested in the FRAs are not enforceable. The new Fire Safety Policy includes a section on remedial actions, and this sets out the approximate timescales that the Council should now aim to work to, although these still needed to be formalised and agreed, with the associated 'Fire Strategy' still under development.

### **Recommendation**

**The Fire Strategy (incorporating the Council's process for agreeing the prioritisation of actions identified within the FRAs) should be completed and agreed by all applicable parties, with all suggested works subsequently being assessed, prioritised and programmed in line with this strategy.**

The PBS suggested that the high priority works (as currently set out in the FRAs) at the high-rise properties were being prioritised, with some progress being made on other high priority actions (as set out on the FRA Actions spreadsheet).

As previously highlighted, a lot of the actions fall outside of the scope of the contracts (e.g. waste clearance, advice to tenants etc.) so this work would be passed to the relevant section for action.

The new Fire Safety Policy is supported by a competencies document which sets out what qualifications / accreditation that the assessors should hold.

The current FRAs in place, completed by Pennington's, set out the name of the person completing the assessment and the person who has undertaken quality assurance on the document. The certificates included within the FRAs state the registration number of Pennington's as the certified organisation which confirms that the organisation is appropriately accredited.



#### 4.6.2 **Potential Risk: Works required are missed when reviewing the Fire Risk Assessments.**

The HSPM raised an issue with regards to the latest FRAs performed in that the assessors from Pennington's had not visited the properties with Council staff. As a result, they had not been able to access some relevant parts of the buildings, so their assessments included actions such as 'management to access the intake cupboards to ensure they are free from combustible materials'. Obviously, if they had visited with Council staff, they could have undertaken the review at the time of their visits and commented accordingly.

These issues had led to the Fire Service advising that the FRAs for the high-rise properties they had reviewed were not 'sufficient or suitable'.

#### **Recommendation**

**It should be ensured that contractors performing fire risk assessments should coordinate their visits with appropriate members of Council staff or they are provided with keys and all applicable drawings and associated documentation so that they can access all relevant parts of the buildings to enable 'complete' assessments to be undertaken.**

#### 4.6.3 **Potential Risk: Work programmes are ineffective / do not address the highest risks in a timely manner.**

The PBS advised that 'outline' risk profiling has been undertaken, with the high rise (greater than 18m in height) being undertaken first, with those with cladding being the highest risk. Sheltered schemes will then be picked up due to the vulnerability of the residents. Non-traditional builds will be next in line followed by 'everything else'.

This strategy is set out at end of the 'RAG' reports that are prepared on a monthly basis.

As highlighted above, the works to the high-rise properties were being dealt with by Wates, but works had not progressed past the 'Pre-Construction Services Agreement' stage for the four blocks with cladding issues (external wall insulation), with this stage covering building investigation and a review of the options available for refurbishment, so specific works to these properties have not yet been programmed.

The second priority properties (sheltered schemes) have been given to another contractor to deal with (Seddon). One block has already been given to them to work on and another was due to be handed over.

Of the FRA actions identified, the spreadsheet includes the risk rating for all of the works required, as set out on the FRAs. However, as previously highlighted, a 'competent person' at the Council is able to review the actions to assign its own priority ratings / timescales to the work.

As previously highlighted, the main works were currently being done on a block-by-block basis, with high-risk high rise and sheltered schemes being picked up

first, where all works to the specific properties were to be done at the same time, so specific timescales for individual jobs were not relevant.

However, the PBS advised that the 'holistic approach' was coming to an end and high-risk / priority actions will be targeted going forward (works such as compartmentation and fire doors), and this would be formally set out as part of the next procurement exercise.

#### 4.7 **Other Risks**

##### 4.7.1 **Potential Risk: Contractor capacity to undertake all required works is insufficient.**

The specifications for the two contracts were reviewed to ensure that it was clear how much work was required to allow for the contractors to allocate appropriate resources.

As previously highlighted, the contract for Wates currently covers the initial PCSA works. The contract document clearly sets out the scope of the works (i.e. the specified works at four residential blocks).

The specifications set out in the contract with Seddon are the standard framework specifications as opposed to anything specific to the work being undertaken.

However, the PBS suggested that, as national companies on major frameworks, they would both be able to pick up double the amount of work that they have been awarded.

As indicated earlier in the report, contract monitoring is undertaken regularly with RAG reports being produced which set out the progress with the various streams, the tasks performed and any tasks that have been delayed. No capacity issues were noted in the reports provided.

##### 4.7.2 **Potential Risk: Internal staffing resources insufficient to deal with fire door reviews and / or reviewing Fire Risk Assessments and placing works orders.**

The PBS advised that the checks performed 'internally' are part of the compliance processes (which are the subject of separate audits). However, where new doors are being installed, the company installing them should be ensuring that they are checked appropriately upon installation. Seddon's have been performing the installs for the blocks that they have covered.

Where new doors are required outside of the current contracted works (e.g. replacement due to police or fire service breaking the door down), these will be dealt with via other contractors (Axis or Bell) and they would similarly be required to confirm that the checks have been undertaken to ensure that they are correctly installed.

Evidence was provided to Internal Audit of the reports provided to the Council to confirm that compliance checks were being performed.

As previously highlighted, Fire Risk Assessments are now performed by an external contractor (Pennington's) as the Building Control staff were no longer suitably qualified. As such, there is no current plan to pass this role on to another team within the Council.

**4.7.3 Potential Risk: Fire Risk Assessments cannot be accessed or updated due to use of AssessNet.**

The HSPM suggested that AssessNet was not currently used for the FRAs. However, the new version of AssessNet should be going live by the end of February and that it should be used for FRAs again in the future.

He suggested that BSL was pulling together a central 'database' spreadsheet (covering all compliance areas) to ensure that we had all of the relevant FRAs in place and updated, although this was still in development.

The BSL provided access to the spreadsheet and highlighted that it was hyperlinked to documentation that had been collected to date, incorporating the latest Pennington's FRAs. However, this process would take time to develop.

He was also updating the spreadsheet with information held on Active H as to works that had already been undertaken and highlighted that, in future, Active H should be the main record as opposed to the spreadsheet, with records for each property being updated accordingly on the system and documentation attached as appropriate.

**4.7.4 Potential Risk: Loss of experience due to re-procurement of the contracts and moving the Fire Risk Assessments from Building Control.**

The PBS advised that there is no (current) requirement for FRA processes to be documented, as the assessments are being undertaken by contractors who should be accredited and would, therefore, know what needs to be done.

Similarly, there would be no need for any handover meetings for contractors performing the required works as, if a new contractor was required, the new contractor would be given specifications to meet with the old contractor expected to complete their contracted works.

However, as highlighted in 2.3 above, the audit was undertaken during a period of change, with members of staff leaving during the course of the audit and other changes in the near future (the departure of the current PBS). There is, therefore, a risk that the new staff are not apprised of the existing arrangements in place in relation to the contracts, works in progress, competencies etc.

**Recommendation**

**Ensure that the Building Safety Lead and the (new) Fire Safety Lead are provided with all relevant information before the Principal Building Surveyor leaves his post.**

## 5 Summary and Conclusions

5.1 Section 3.2 sets out the risks that are under review as part of this audit. The review highlighted weaknesses against the following risks:

- Risk 1 - Insufficient budget to undertake all of the works required as identified during Fire Risk Assessments.
- Risk 2 – Inappropriate procurement of contracts.
- Risk 3 - Failure to meet the requirements of the Fire Safety (England) Regulations 2022 in line with specified timeframes.
- Risk 7 - Fire Risk Assessments are out of date or do not pick up all relevant risks.
- Risk 8 - Works required are missed when reviewing the Fire Risk Assessments.
- Risk 13 - Loss of experience due to re-procurement of the contracts and moving the Fire Risk Assessments from Building Control.

5.2 In overall terms, therefore, we can only give a MODERATE degree of assurance that the systems and controls in place in respect of Aids and Adaptations are appropriate and are working effectively to help mitigate and control the identified risks.

5.3 The assurance bands are shown below:

<b>Level of Assurance</b>	<b>Definition</b>
Substantial	There is a sound system of control in place and compliance with the key controls.
Moderate	Whilst the system of control is broadly satisfactory, some controls are weak or non-existent and there is non-compliance with several controls.
Limited	The system of control is generally weak and there is non-compliance with controls that do exist.

## 6 Management Action

6.1 The recommendations arising above are reproduced in the attached Action Plan (Appendix A) for management attention.

Richard Barr  
Audit and Risk Manager

## Action Plan

## Internal Audit of Fire Safety and Prevention Contracts – February 2024

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.1	Financial Risks – Insufficient budget to undertake all of the works required as identified during Fire Risk Assessments.	Monthly cost figures should be provided and reviewed against budget to ensure that the overall cost and budget are still in line with the agreed prices.	Medium	Head of Housing	Agreed. Cost monitoring against the budget will be undertaken.	December 2024
4.2.2 (a)	Financial Risks – Inappropriate procurement of contracts.	The ongoing contract situation should be resolved as soon as possible to ensure that these high-profile works are completed in a timely manner, with the contracts reflecting the agreed ways of working going forward and compliance with relevant regulations.	High	Head of Housing and Head of Neighbourhood and Assets	Agreed. The contract situation will be resolved as soon as possible in line with the Gateway process approval by the Building Safety Regulator and applicable procurement legislation.  It will be ensured that the new contracts take due regard of issues such as competencies required, liquidated damages, agreement of contract variations, review of works, invoicing and insurance.	December 2024

<b>Report Ref.</b>	<b>Risk Area</b>	<b>Recommendation</b>	<b>Rating*</b>	<b>Responsible Officer(s)</b>	<b>Management Response</b>	<b>Target Date</b>
4.2.2 (b)	Financial Risks – Inappropriate procurement of contracts.	It should be ensured that appropriate KPIs are included in all relevant contracts let in the future.	Medium	Head of Housing and Head of Neighbourhood and Assets	Agreed. Appropriate KPIs will be included in future contracts.	December 2024
4.3.1 (a)	Legal and Regulatory Risks – Failure to meet the requirements of the Fire Safety (England) Regulations 2022 in line with specified timeframes.	It should be ensured that all relevant properties have had a fire risk assessment performed.	High	Head of Housing and Head of Neighbourhood and Assets	Agreed. It will be ensured that FRAs will be performed for all relevant properties.	December 2024
4.3.1 (b)	Legal and Regulatory Risks – Failure to meet the requirements of the Fire Safety (England) Regulations 2022 in line with specified timeframes.	It should be ensured that all actions identified on the FRAs performed are recorded on the actions spreadsheet to ensure works are performed as required.	High	Head of Housing and Head of Neighbourhood and Assets	<p>The main record for these works should move to Active H as opposed to the individual spreadsheets so that all staff are able to access and amend the 'master' records.</p> <p>All works to be performed, as agreed following the assessment of the FRAs by internal (qualified) staff will be recorded on the system with works orders raised as appropriate.</p> <p>However, until this complete record is available on Active H, the spreadsheet will be maintained.</p>	December 2024

<b>Report Ref.</b>	<b>Risk Area</b>	<b>Recommendation</b>	<b>Rating*</b>	<b>Responsible Officer(s)</b>	<b>Management Response</b>	<b>Target Date</b>
4.6.1 (a)	Health, Safety and Wellbeing Risks – Fire Risk Assessments are out of date or do not pick up all relevant risks.	It should be ensured that the actions spreadsheet includes actions identified from the most recent assessments performed.	High	Head of Housing and Head of Neighbourhood and Assets	As per 4.3.1(b) above, the main record for the FRA actions will move to Active H, so it will be ensured that all works required in relation to the agreed actions will be recorded on the system (including any outstanding from previous FRAs which are not technically 'out of date'). However, until that time, the spreadsheet will be maintained as required.	December 2024
4.6.1 (b)	Health, Safety and Wellbeing Risks – Fire Risk Assessments are out of date or do not pick up all relevant risks.	The Fire Strategy (incorporating the Council's process for agreeing the prioritisation of actions identified within the FRAs) should be completed and agreed by all applicable parties, with all suggested works subsequently being assessed, prioritised and programmed in line with this strategy.	Medium	Head of Housing and Head of Neighbourhood and Assets	Agreed. The Policy and Strategy are currently going through a review to ensure that they reflect the correct processes.	December 2024

<b>Report Ref.</b>	<b>Risk Area</b>	<b>Recommendation</b>	<b>Rating*</b>	<b>Responsible Officer(s)</b>	<b>Management Response</b>	<b>Target Date</b>
4.6.2	Health, Safety and Wellbeing Risks – Works required are missed when reviewing the Fire Risk Assessments.	It should be ensured that contractors performing fire risk assessments coordinate their visits with appropriate members of Council staff or they are provided with keys and all applicable drawings and associated documentation so that they can access all relevant parts of the buildings to enable 'complete' assessments to be undertaken.	Medium	Head of Neighbourhood and Assets and Head of Housing	Agreed. It will be ensured that visits are appropriately coordinated.	December 2024
4.7.4	Other Risks - Loss of experience due to re-procurement of the contracts and moving the Fire Risk Assessments from Building Control.	Ensure that the Building Safety Lead and the (new) Fire Safety Lead are provided with all relevant information before the Principal Building Surveyor leaves his post.	Medium	Building Safety Lead and Fire Safety Lead	An appropriate handover process was followed prior to the departure of the Principal Building Surveyor.	Completed

\* The ratings refer to how the recommendation affects the overall risk and are defined as follows:

- High: Issue of significant importance requiring urgent attention.
- Medium: Issue of moderate importance requiring prompt attention.
- Low: Issue of minor importance requiring attention.