

Highlight Report No. 3
14th February 2024
Period Covered: 18 January 2024 to 14 February 2024

Executive summary:

1. Of the 33 individual recommendations, 6 are complete on time, 26 are underway, and 1 is yet to start (and was not expected to have started at this stage). However, the Fire Safety Lead has subsequently left and we are actively recruiting for the position (specific notes below).
2. The Target Date for Recommendation 17 has been extended at the request of the Head of Finance, as Lead Officer.
3. A new recommendation of 12a in regard to specific policies is being proposed. See description below.
4. Jen Morrison, Project Manager, started on the 1st of February.
5. Training now completed for SLT / Cabinet and Asset Compliance Committee. Follow up training will be provided as required and for any new councillors.
6. Work on the data validation has progressed this month and will provide a basis for other requirements
7. A meeting with the Regulator of Social Housing will be held bi-monthly until the end of the project.
8. The Risk Register has been updated, no change to existing risks but two additional risks around refresher training and financial risk have been added.
9. The Compliance Action Team is meeting each month to look back at matters arising from Compliance Board and to plan documents needed for the next meeting of the Board.
10. The next meeting of the Compliance Board will be on the second Wednesday of the next month (13th March 2024).

Compliance Roadmap – Cross Cutting Recommendations

Programme: The current **estimated** date to achieve **full compliance with the Action Plan** is **31 October 2024**

Key Deliverables	Priority	Target Date	Revised Target Date	Lead Officer	Progress	Completion Date	Status	Notes
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					(Previous report in brackets)			
Recommendation 1 – Governance and assurance structure:	Critical	09.11.23	09.11.23	DK	100% (100%)	09.11.23	Complete	Compliance Board and Asset Compliance Committee
Recommendation 2 – Compliance awareness session:	High	22.12.23	22.12.23	DK	100% (90%)	21.12.23	Complete	Course completed for SLT & Cabinet on the 29.11.2023. Course completed for the Asset Compliance Committee – 21 December 2023
Recommendation 3 – Compliance and building safety strategy: Develop a standalone compliance and building safety strategy that: sets out your objectives, addresses the recommendations within this report and outlines how they will be achieved. Ensure that you are clear on: Legal and regulatory obligations, now and in the future Your overall objectives for property compliance, building safety and resident safety.	High	30.06.24	30.06.24	SP	15% (10%)		In Progress	Pennington Consultants quoted to assist and advise in policy development. Fire Safety policy (including strategy) developed, through consultation and ready for sign-off. Both Fire Safety lead and Building Safety lead are tasked with developing a building safety strategy and Pennington engaged to assist in this process.

<p>What actions need to be delivered to achieve these objectives.</p> <p>How you will demonstrate that these actions are deliverable.</p>								
<p>Recommendation 4 – Fire Safety Group:</p> <p>Broaden the scope of the existing Fire Safety Group to have full oversight of all legal fire and building safety requirements.</p> <p>Develop a term of reference for the group that ensures achieving the requirements of fire and building safety legislation and guidance is included as a standard agenda item.</p>	High	09.11.23	09.11.23	LB	100% (100%)	19.10.23	Complete	<p>Terms of Reference Drafted.</p> <p>Draft TOR circulated for comment.</p> <p>Discussed and agreed TOR at Fire Safety Group 19/10/23.</p> <p>Saved on Teams channel for R04</p>
<p>Recommendation 5 – Data Validation:</p> <p>Undertake a data validation exercise that is coordinated across all compliance areas to gain assurance around all property assets, compliance programmes and records:</p> <p>Download the full asset list from your parent management system into a data validation workbook.</p>	Critical	30.06.24	30.06.24	SH	45% (30%)		In Progress	<p>Internal:</p> <p>5.1) Download full asset list – complete 03/11</p> <p>5.2) Create Validation Workbook – complete 03/11</p> <p>The database query is complete in that brings in to the validation workbook all required data, however the query will require ongoing finessing as we work on interdependent recommendations such as R6 and R11</p> <p>5.3) Confirm properties for each compliance area – complete 31/01</p>

<p>Confirm which properties will or will not be subject to each compliance programme. All properties should be defaulted to require an inspection until it can be evidenced otherwise.</p> <p>Record evidence-based reasons for properties not required on each programme.</p> <p>Validate a sample of compliance records to ensure they are valid and in date.</p> <p>Quantify compliance gaps to develop a plan to resolve them.</p> <p>Validation should include categorising buildings (11+ and 18m+) and the smoke and carbon monoxide alarm programmes.</p> <p>Follow the above exercise with regular, documented validation to ensure asset and compliance data remains up to date.</p>								<p>The count of properties that are subject to a 'compliance area' is now accurate and complete with the output related to R11 (Compliance Reporting) now demonstrating the properties confirmed as On-Plan, Off-Plan or where Validation is still required. The validation exercise to confirm <u>status</u> within a 'compliance area' is ongoing.</p> <p>5.4) Evidence N/A properties – 75%</p> <p>We are now able to evidence N/A properties having created additional fields within ActiveH to determine this. This work is interdependent with R6 ActiveH Configuration and is driven by the validation exercise above.</p> <p>Currently working to validate, evidence and quantify remaining gaps identified in the reporting.</p> <p>5.5) External (Work with Pennington Choices for third party Data Validation and Assurance): Currently at Stage 3 of their Terms of Reference, Compliance Programme Data. Next meeting 08/02/2024 Data Review Meeting - Completed PC to provide worksheets for Pilot validation exercise by WDC by 09/02 PC to provide list of 300 Assets requiring inspection records to provided back to PC by 09/02 Above data requests to PC required by 18/02</p>
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<p>Recommendation 6 – Active H configuration:</p> <p>Configure Active H to record the correct compliance programme data and provide appropriate reporting outputs.</p>	High	30.06.24	30.06.24	SH	50% (30%)		In Progress	Attribute configuration completed for Gas, CO2, EICR, AFD, FRA and LRA. Attribute for LOLER and Occurrences created. Asbestos still outstanding for review and configuration.
<p>Recommendation 7 – Managing follow-up actions:</p> <p>Implement a process for tracking all actions deriving from each of your compliance programmes. You should consider and agree: the platform for recording actions, where the process can be automated, allocation, quality checks, evidence of completion and reporting.</p>	High	31.10.24	31.10.24	SH	10% (10%)		In Progress	<p>Existing FRA actions now all in centralised spreadsheet. Ability to prioritise in relation to property, severity, department etc. Completed actions to be updated in spreadsheet, with completion date added. Comments to be added to outstanding actions.</p> <p>Work already undertaken with ICT on development of the Contractor Web Portal over the last 12 months which supports this Recommendation. The work done to-date is currently in TEST pending User Acceptance Testing, (UAT).</p>
<p>Recommendation 8 – Changes to asset and programme lists:</p> <p>Formalise and document the process for adding, removing or making changes to properties on Active H, including who has authority to do so.</p> <p>Ensure there is a clear audit trail of uploading and setting attributes against each property and quality assurance checks to ensure</p>	Medium	31.03.24	31.03.24	SH	10% (0%)		In Progress	<p>First meeting held on Tuesday 6th February to discuss the creation of new assets in ActiveH, primarily new builds, market acquisitions.</p> <p>UAT also required on the browser-based Certificate Importer which will greatly assist in the handling of documents/certificates and creation of Attribute records in ActiveH.</p>

each property is on the correct compliance programme.								
<p>Recommendation 9 – Operational lead for fire safety:</p> <p>Appoint an operational lead for fire safety to have oversight of all fire safety related programmes and performance (fire risk assessment programme and actions, Fire Safety (England) Regulations obligations, fire equipment servicing, and so on).</p>	Critical	31.12.23	31.12.23	SP	100% (100%)	27.11.23	Complete	<p>Charles Hahn appointed as Operational Lead for Fire Safety – started 27.11.23</p> <p>9.1) On Monday 29/01/24 The Fire Safety Lead decided to pursue a new venture and resigned from his post at (WDC)</p> <p>9.2) Interviews are taking place on the 7th and 9th of February 2024 with the view of appointing a new Fire Safety Lead.</p> <p>9.3) Members will be updated at the next meeting.</p>
<p>Recommendation 10 – Operational lead for building safety:</p> <p>Appoint an operational lead for building safety to support the strategic lead (Head of Neighbourhood and Assets) and take overall operational responsibility for day-to-day management of building safety risks in higher-risk buildings, and communications with residents of those buildings.</p> <p>Operational duties can be delegated; however the operational lead should have full oversight of all activities through a clear</p>	Critical	30.11.23	30.11.23	SP	100% (100%)	07.12.23	Complete	<p>Richard Barratt appointed Building Safety Lead – started 07.12.23</p>

assurance and 'lines of defence' framework								
<p>Recommendation 11 – Compliance reporting:</p> <p>Develop a standalone weekly compliance report that covers the big six compliance areas and addresses the items raised in the report (Section 3.5).</p> <p>This new report should also be used to provide monthly and quarterly summaries to the management and Leadership Team. Reporting should include follow-up actions: total number of actions, actions by risk/priority, actions completed in time and overdue, and supporting narrative to provide a status summary.</p> <p>Data should be driven from Active H and performance presented in an easy to read format. Use our compliance scorecard examples as a benchmark for current best practice.</p>	High	31.10.24	31.10.24	SH	40% (25%)		In Progress	<p>Progress on this action is also detailed as part of Recommendation 5.</p> <p>Various output options being considered with work being done on simplifying and providing a consistent foundation to queries with database functions.</p> <p>Possible need to extend due date if opportunities to develop reports beyond Recommendation scope present themselves.</p> <p>15/01 - Compliance Dashboard Report and Summary have been updated substantially since last Highlight report. Snapshots summaries now possible with conditional formatting of performance against historical snapshots.</p>
<p>Recommendation 12 – Policies</p> <p>12.0) The Leadership Team and technical team members should attend a</p>	High	31.01.24	31.01.24	SP	100% (5%)	31.01.24	Complete	<p>12.0) Facilitated session held on 16th January 2024, led by the specialist Fire and Building Safety leads. Gap analysis identified and responsibility for providing / updating policies, KPIs, contractor competencies etc.</p>

<p>facilitated session to agree policy principles (obligations, inspection programmes, follow-up works, contractor competencies, KPIs, and so on).</p>								<p>For transparency, Pennington have indicated that they do not consider this recommendation to be complete as they were not invited to facilitate the session (at a cost to the Council).</p> <p>The session was facilitated by the Fire Safety Lead / Building Safety Lead and not Pennington. Discussions will be needed to resolve this issue with Pennington.</p>
<p>Recommendation 12a – Policies</p> <p>12.0) The output of this session will be used to draft seven separate policy documents which should be approved through your updated governance framework, subject to version control and reviewed every two years (or sooner, if there is a change in legislation, regulation or other approved guidance).</p>	High	31.07.24	31.07.24	SP	30% (0%)		In Progress	<p><u>Compliance Workstreams Policies:</u></p> <p><u>12.1</u> Fire safety policy (Complete)</p> <p><u>12.2</u> Heating safety (In progress RB)</p> <p><u>12.3</u> Electrical safety (Lead RB)</p> <p><u>12.4</u> Asbestos management (Lead RB)</p> <p><u>12.5</u> Water hygiene (Lead TBC)</p> <p><u>12.6</u> Lift safety (Lead TBC)</p> <p><u>12.7</u> Building safety (In progress RB)</p> <p><u>12.8</u> The next progress meeting is scheduled for the 12th of February.</p> <p><u>12.9</u> Members will be updated at the next meeting.</p>
<p>Recommendation 13 – Process maps & procedures:</p> <p>Once the policies have been approved, develop standalone procedure documents and process maps to support each of your policies.</p>	High	31.09.24	31.09.24	SP	0%		Not Started	<p>Pennington Consultants quoted for consultancy. Links to Recommendation 12 and 12a.</p> <p>As soon as an individual policy is approved process mapping will commence.</p>

<p>Your procedure documents should clearly outline how each of your service areas are delivered operationally.</p> <p>The process maps should visibly demonstrate the end-to-end process and areas of responsibility for all parties involved.</p>								
<p>Recommendation 14 – Competence & Training matrix:</p> <p>Develop a training matrix to specify the training, competence and qualification requirements for all employees responsible for oversight and delivery of compliance and building safety programmes.</p> <p>This will identify gaps and ensure training and competence is kept up to date.</p> <p>Any gaps should be addressed by undertaking appropriate qualifications within appropriate timeframes.</p>	High	31.03.24	31.03.24	FJQ	66% (55%)		In Progress	<p>Still awaiting national Guidance on development of competence matrix, but work continues based on Best Practice/external discussions.</p> <p>Required competency Levels created- subject to consultation (formal stages of this arranged)</p> <p>Competence Matrix skeleton created subject to consultation (formal stages of this arranged)</p> <p>Required training courses identified in most cases but two training courses will need developing (one internal, one external)</p>

<p>Recommendation 15 – Compliance and building safety refresher training:</p> <p>The Compliance Team should undertake refresher training that covers all compliance areas to refresh their knowledge and ensure they remain up to date with the latest legislation and obligations.</p>	Medium	30.6.24	30.6.24	SH	50% (0%)		In Progress	<p>15.1 CORGI (Council for Registered Gas Installers) Offer compliance training across all compliance workstreams (Gas, Electrical, Asbestos, Water hygiene, lifts, Fire safety)</p> <p>15.2 CORGI Have been invited to present their training module to members of the compliance team on the 12th of February.</p> <p>15.3 The CORGI Training model is also supported by approved qualifications. A quotation to provide this training for all staff within the compliance team has been obtained for debate and decision.</p> <p>15.4 Members will be updated at the next meeting on the outcome of this workshop.</p>
<p>Recommendation 16 – Contract management:</p> <p>Ensure your regular contractor performance meetings include standard agendas, record minutes and monitor key performance indicators. Also incorporate checks of accreditations, insurances, competency, and any changes to staff, and ensure evidence is provided.</p> <p>Undertake regular, documented contractor competency checks (at least annually).</p> <p>Migrate data and records from contractors’ systems to Active H to re-establish</p>	Medium	31.03.24	31.03.24	SH	50% (10%)		In Progress	<p>Will develop with Fire and Building Safety Leads to develop a framework for contractor performance meetings with standardised document format. Expected to be on target</p> <p>Richard Barrett (BSL) has started work on this. Mainly around obtaining Contractor accreditations, insurances and competencies.</p> <p>Richard Southey (ICT) has also provided in proof of concept browser-based Contractor DMS connected to Contractor records in ActiveH. This requires review and UAT.</p> <p>16.1 In progress and being developed by the (BSL)</p> <p>16.2 Discussions with all six compliance contractors have taken place and an overview of documents collected to date are detailed below.</p> <ul style="list-style-type: none"> > Insurance > Health and safety policies

<p>full control, ownership and accountability of all compliance programme data to ensure programmes are driven by WDC.</p>								<p>> Accreditations</p> <p>> Qualifications</p> <p>> Gas safe cards and validation against the gas safe register</p> <p>> Evidence of contractor personal working on the (WDC) contracts.</p> <p>16.3) These documents are currently being validated and are stored in a central database which can be shared in the interim period with the compliance team.</p> <p>(ICT) Are creating a new contractor document folder within ActiveH to store these documents.</p> <p>Going forward, all contractors will have an annual compliance check carried out by members of the compliance team.</p> <p>16.4) Discussions are in progress with the contractors who store certification on their own portal and will continue to agree a process of transferring these documents into ActiveH.</p> <p>16.5) Members will be updated at the next meeting.</p>
<p>Recommendation 17 – Internal audit:</p> <p>Ensure that your internal audit regime reviews all seven compliance areas at least once every two years,</p>	<p>Medium</p>	<p>30.01.24</p>	<p>29.02.24</p>	<p>AR</p>	<p>30%</p>		<p>In Progress</p>	<p>Part 1 Response</p> <p>The need for specific themed compliance audits (covering both Corporate and HRA properties) had already been identified and the strategic plan, which had been approved by the (then) Chair of the Audit and Standards Committee in April 2023, includes audits against 6 of the 7 identified areas (Fire Safety</p>

<p>and as a minimum, establishes whether WDC is compliant with its legal and regulatory obligations.</p> <p>Ensure that your internal auditor has the required levels of competence and knowledge of legal, regulatory and best practice compliance obligations to provide a meaningful assurance report with appropriate assurance ratings.</p>					<p>(30%)</p>		<p>Compliance (2023/24), Asbestos Management and Legionella Management (both 24/25), Lifts and Lifting Equipment, and Gas and Electrical Safety (both 25/26)). The one area that does not have a specific audit is building safety – we have an audit of Fire Safety and Prevention Contracts included in this year as well, but in the (draft) brief, there is specific reference to the fact that Pennington’s are doing work in the area of Building Safety Cases, so these were omitted from the scope of the audit, with assurance to be placed on their work.</p> <p>The planned audits set out above will again be included in the strategic plan for 2024/25 onwards (assuming that no revisions are agreed as part of the discussions with individual service areas), with the new plan being reported to Audit and Standards in March (date TBC).</p> <p>The scope of the audits will be agreed at the start of each audit, with assurance being taken from any extra work undertaken by external bodies on these seven areas (see part 2), with any actions identified by them being followed up to ensure that non-compliance with legislation is being addressed.</p> <p>(Nb - It should be noted that we were not asked for our plans as part of the review, just copies of specific reports undertaken within the last two years and, as with the current Fire Safety and Prevention Contracts audit, there may have been other reports that touched on areas of compliance.)</p> <p>Target Date – 1 April (for Strategic Plan to be approved by A&S). Dates for specific compliance audits contained within response. Audit plan is in draft stage currently.</p> <p><i>Part 2 Response</i></p> <p><i>Specific support will be commissioned (Audit with steer by assets), with the required level of specialist technical expertise and knowledge of legal regulatory and best practice compliance obligations to provide the necessary assurance across all 7 compliance areas. This will form part of the evidence base from which Internal Audit can complete their</i></p>
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							<p><i>specific themed compliance audits (as addressed in part 1) and be reflected within the assurance reports from which assurance ratings are provided.</i></p> <p><i>Target date revised to reflect start of Tender exercise – not full completion of task. Delay due to staff absences.</i></p> <p>The strategic audit plan, which will be presented for approval by Audit & Standards on 27 February 2024, includes a number of different compliance audits to cover the relevant areas.</p> <p>Following consultation with Senior Management as part of the drafting of the strategic audit plan, these audits are currently included within years two and three of the plan in order to ensure that the other actions from this Compliance Roadmap Action Plan have been completed. The work of Internal Audit can then provide assurance that these actions have been addressed appropriately.</p> <p>Where relevant, Internal Audit may seek to appoint external specialist auditors to assist with these reviews.</p>
<p>Recommendation 18 – External audit:</p> <p>Implement 100 per cent desktop checks of compliance records to provide assurance that certification has been completed correctly (for example, nine-point check of gas safety records) and follow-up works are actioned within an appropriate timeframe.</p> <p>Implement a third-party technical auditing regime across all compliance areas to undertake sample checks</p>	High	31.05.24	31.05.24	SP	50% (25%)	In Progress	<p>18.1) CORGI (Council for Registered Gas Installers) Offer an independent validation service across all six compliance workstreams (Gas, Electrical, Asbestos, Water hygiene, lifts, Fire safety)</p> <p>CORGI Will report on the outcomes of certification issued to them by (WDC) (Pass or Fail) and have a process for correction with the applicable contractor or consultant who deliver these services.</p> <p>CORGI Will also carry out a physical post inspection of complete works to ensure that they are compliant with current legislation.</p> <p>18.2) CORGI Have agreed to carry out a presentation on the 12th of February with members of the compliance team.</p> <p>18.3) The (BSL) Has held discussions with CORGI and obtained their training course details which are supported by qualifications and associated quotation to provide this training for all staff within the compliance team.</p>

<p>of contractors' field work and desktop reviews of compliance records. The auditor(s) should be competent and appropriately accredited.</p>							
<p>Recommendation 19 – resident communications:</p> <p>Develop and implement a formal resident communications campaign to share key messages around resident health and safety across all areas of property compliance and building safety.</p> <p>This should include consideration of the legal fire and building safety requirements under the Fire Safety (England) Regulations 2022 and Building Safety Act 2022.</p> <p>Also consider how you intend to inform harder to reach groups, such as those without internet access, where English is not their first language, or those with disabilities and impairments.</p>	<p>Medium</p>	<p>30.06.24</p>	<p>30.06.24</p>	<p>NC</p>	<p>20% (20%)</p>	<p>In Progress</p>	<p>A survey has been developed which will be issued to all housing tenants end December/early January.</p> <p>The results of this will be used to inform the Strategy.</p> <p>The results will also be used as a basis for identifying hard to reach groups and how to consistently reach them.</p> <p>Regular comms with tenants starting with their newsletter issued in December, which will feature an article about the audit and the action plan.</p>
<p>Recommendation 20 – Gas and heating safety:</p> <p>Implement checks to ensure tenants are receiving LGSRs</p>	<p>High</p>	<p>30.06.24</p>	<p>30.06.24</p>	<p>SH</p>	<p>5% (5%)</p>	<p>In Progress</p>	<p>Meeting on 10/10 to review existing no access process, existing policy and procedure.</p>

<p>within 28 days of the service.</p> <p>Display LSGRs in communal areas of buildings served by a communal boiler.</p> <p>Ensure you can demonstrate compliance with the Smoke and Carbon Monoxide (Amendment) Regulations 2022</p> <p>Ensure the following items are addressed as part of policy, procedure and process map development:</p> <p>End-to-end access process.</p> <p>Managing remedial actions.</p> <p>New tenant checks to ensure they arrange turn on and test visits.</p> <p>Checks on properties that are not currently connected to the gas mains networks.</p> <p>Compliance with Dangerous Substances and Explosive Atmosphere Regulations 2002 through risk assessments (where necessary).</p>					10%			<p>2009 policy and procedure identified, walk through of existing HPM (ActiveH Case Processing) for Gas Safety No Access.</p> <p>Meeting on 14/11 identify required updates to Process Mapping, follow up meeting to be arranged January 2024.</p> <p>20.1) Building Safety Lead has held discussions with heating contractor and a process is to be developed. However, where tenants have an email address the LSGR is emailed to the tenant the day after the annual gas check. A new process is required for those tenants with no email address.</p> <p>20.2) A process is also required to display LSGRs in communal areas.</p> <p>20.3) Smoke and carbon monoxide detectors process is currently under review.</p> <p>20.4) Managing remedial actions is currently under review.</p> <p>20.5) New tenant checks are currently under review.</p> <p>20.6) Checks on properties not currently connected to the gas mains are to be reviewed.</p>
<p>Recommendation 21 – Electrical safety:</p>	High	31.10.24	31.10.24	SH	10% (10%)		In Progress	<p>232 properties have now been identified (05/12) as recorded not having an in-date certificate in the housing database, (ActiveH). We are establishing with the</p>

<p>Establish a catch-up programme to address the non-compliant properties that do not have a valid test certificate dated within the last five years.</p> <p>Ensure the following items are addressed as part of policy, procedure and process map development:</p> <p>End-to-end access process. Managing remedial actions.</p> <p>Ensuring Active H captures reinspection dates less than five years (as recommended by the competent person)</p>					<p>10%</p> <p>(10%)</p>			<p>Contractor whether data exists and are already completed before raising planned programme of works to rectify. In addition, we have 109 (05/12) missing EICR's from new builds according to ActiveH – Lead Officer to liaise with Housing Development and whether they can provide or obtain from the Developer.</p> <p>Attribute updated in ActiveH to accommodate new data, (assisting with Recommendation 5, 6, 11 and General Recommendation 7).</p>
<p>Recommendation 22 – Fire safety:</p> <p>Complete all outstanding fire risk assessments (FRAs) in line with the fire risk assessor's recommended reassessment frequency.</p> <p>Extract all FRA actions into an appropriate monitoring platform to accurately track the completion of each action. Record who the actions have been allocated to, action priorities and timeframes, completion dates and supporting evidence (post</p>	<p>Critical</p>	<p>31.04.24</p>	<p>31.04.24</p>	<p>SP</p>	<p>10%</p> <p>(10%)</p>		<p>In Progress</p>	<p>Additional person engaged and trained to carry out fire door checks - fixed term to June 2024 and will be reviewed.</p> <p>Fire safety lead appointed and joining a review of existing FRA (including accuracy and appropriateness) and recommended actions which, if confirmed, have been put into an appropriate monitoring platform (point 2)</p> <p>New Fire Risk Assessments for all medium/high rise properties commissioned by Housing.</p> <p>Housing site staff carry out daily inspections of high rise and weekly of medium rise.</p> <p>Fire Safety Lead, Building Safety Lead and Health & Safety Manager developing policy, procedure, and process map plus new Fire Safety (and building safety) Policy/ Strategy (see recommendation 3)- which includes recommendation</p>

<p>inspections, certification, before/after photographs, etc.).</p> <p>Ensure you can demonstrate compliance with the Fire Safety (England) Regulations 2022, including undertaking fire door checks.</p> <p>Consider undertaking Type 3 FRAs to all properties as this provides a more detailed understanding by assessing a sample of homes within each block.</p> <p>Ensure the following items are addressed as part of policy, procedure and process map development:</p> <p>Management and reporting of periodic checks on fire safety equipment.</p> <p>Housing management issues that impact on fire safety, such as hoarding and allocations.</p> <p>Person centred fire risk assessments. Incident management, internal investigation and responding to property fires and near misses. Liaison</p>								<p>to undertake type 4 FRAs and consideration of all other points recommended.</p> <p>22.1) All 6 new FRAs were received January 11, 2024.</p> <p>22.2) In the process of engaging a new Fire Safety Lead who will review the data.</p>
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with the local fire and rescue service								
<p>Recommendation 23 – Asbestos Management:</p> <p>Undertake all outstanding reinspection surveys on your communal blocks to ensure asbestos containing materials are being monitored and managed appropriately. Ensure this is followed by a regular, risk-based reinspection programme, with the frequency determined in agreement with the competent person.</p> <p>Ensure the following items are addressed as part of policy, procedure and process map development:</p> <p>Establish Appointed Person and Deputy Appointed Person roles (ensuring they are appropriately qualified).</p> <p>Develop a fit for purpose asbestos management plan.</p> <p>Use of priority assessment scores and material assessment scores to determine the risk of an asbestos item.</p>	Medium	31.10.24	31.10.24	SH	5% (0%)		In Progress	<p>23.1) Tersus has been appointed to carry out new asbestos surveys across all communal blocks. Once work begins, a weekly programme update will be provided by Tersus.</p>

<p>Recommendation 24 – Water Hygiene:</p> <p>Undertake all outstanding legionella risk assessments.</p> <p>Ensure written schemes of control are documented to provide guidance on how to manage and monitor the risks identified within the legionella risk assessments.</p> <p>Ensure the following items are addressed as part of policy, procedure and process map development:</p> <p>Establish Responsible Person and Deputy Responsible Person roles (ensuring they are appropriately qualified).</p> <p>Managing water hygiene in domestic properties – adopting a practical and proportionate approach.</p> <p>Managing water hygiene void properties (considering the void standard, removing high risk installations, system flushing, replacing shower heads, etc.)</p>	Medium	30.06.24	30.06.24	SH	10% (5%)		In Progress	<p>New Contractor is currently reviewing existing Risk Assessments</p> <p>24.1) Review of existing assessments is ongoing</p>
<p>Recommendation 25 – Lift Safety:</p>	High	31.03.24	31.03.24	SH	60% (60%)		In Progress	ActiveH up to date. New attribute created and populated with information from Contractor.

<p>Review all thorough examination remedial actions and ensure they are completed.</p> <p>Ensure the following items are addressed as part of policy, procedure and process map development:</p> <p>Establish a formal process for notifying the compliance team of new domestic lifts installations.</p> <p>Managing remedial action</p>								<p>We will finalise reporting and publishing of reports from ActiveH.</p> <p>We will be meeting with Contractor to discuss how we 'push' works to them, how its completed and data returned to ActiveH with automation.</p> <p>Building Safety Lead involvement with Corporate Insurance Officer</p>
<p>Recommendation 1 – Building registration:</p> <p>Any higher-risk buildings identified following completion of the wider data validation exercise should be registered with the Building Safety Regulator</p>	Critical	31.03.24	31.03.24	SP	95% (95%)		In Progress	<p>Seven higher-risk buildings registered with the Building Safety Regulator.</p> <p>An identified outcome of the data validation process to confirm final numbers to be registered.</p> <p>Clarendon Square is being deregistered, so will be removed from the list.</p>
<p>Recommendation 2 – Building safety cases and reports:</p> <p>Establish and implement an appropriate infrastructure around property and building safety compliance, which includes, an effective assurance framework,</p>	High	31.03.24	31.03.24	SP	10% (10%)		In Progress	<p>Pennington commissioned to prepare draft building safety cases based on information being supplied and taking in to account latest guidance from the Building safety Regulator.</p> <p>Draft safety case for Eden Court to be completed by Pennington by 15 December 2023 and used as a gap analysis for data.</p>

<p>defining roles and responsibilities and implementing and documenting supporting policies and procedures.</p> <p>This will allow the safety case and safety case report development project to resume and will include documenting a safety management system and building risk assessment.</p>							<p>Daily safety inspections undertaken by housing teams on site.</p> <p>2.1) Target date will need to be reviewed and clarified with Pennington.</p>
<p>Recommendation 3 – Golden thread:</p> <p>Document the approach and commitment to delivering golden thread principles for all higher-risk buildings.</p> <p>This should include what information will be held, what systems will be used, how one version of the truth will be maintained, and how digital information will be accessed, managed and shared to support ongoing reviews of the safety case.</p>	High	31.03.24	31.03.24	SP	10% (10%)	In Progress	<p>Linked to Recommendation 2, above and will form part of the Building Safety Cases.</p> <p>3.1) Will be reviewed after discussion with Pennington (see Recommendation2)</p>
<p>Recommendation 4 – Mandatory occurrence reporting:</p> <p>Develop a mandatory occurrence reporting procedure that captures the</p>	High	31.07.24	31.07.24	FJQ	50% (50%)	In Progress	<p>Existing owned software has been adjusted to incorporate the mandatory reporting as far as is presently specified. More details to be announced by HMG in 2024</p>

<p>principles of reporting and recording safety occurrences as intended by the Act.</p>								
<p>Recommendation 5 – Residents’ engagement strategies:</p> <p>Develop building specific residents’ engagement strategies for your higher-risk buildings that include, tenancy management arrangements, allocations, how residents will be involved in decision-making around building safety risks and how they can access safety information.</p>	<p>High</p>	<p>March 2024</p>	<p>March 2024</p>	<p>SP</p>	<p>25% (15%)</p>			<p>Lead officer to engage with Landlord Services Manager</p> <p>5.1) Survey conducted and ended on the 19th of January. Based on the information received, it was decided that additional results are required. A paper copy of the survey will now be distributed with in person visits to follow. A new closing date for the survey of February 29, 2024 has been set. The results of this will still be used to inform strategy.</p>
<p>Recommendation 6 – Complaints procedure:</p> <p>Either develop a separate complaints procedure or ensure the existing generic procedure is updated to ensure that WDC can satisfy itself that building safety issues have been resolved (for example, taking action to minimise the possibility of recurrence, ensuring there is no impact on the risk profile of the building or updating the building risk assessment and safety case).</p>	<p>High</p>	<p>March 2024</p>	<p>March 2024</p>	<p>GL</p>	<p>50% (25%)</p>		<p>In Progress</p>	<p>There is an agreed timetable for adoption of a new complaints policy and procedure which is as follows:</p> <ul style="list-style-type: none"> • Draft Cabinet approved by Chief Exec/Deputy & Head of Service, Programme Director for Climate Change, Finance, Legal Services & Procurement (when considered appropriate), Section 151 Officer, Monitoring Officer 9/1/2024. • Revisions and Final Draft for 11 January 2024 • Publish SLT Agenda 15 Jan 2024 • Chief Exec / Section 151 Officer / Monitoring Officer / Programme Director for Climate Change to meet to discuss reports and advise author of any changes; and PH to provide comments by this time. 16/01/2024 • SLT agree final policy 18 Jan 2024 • The draft report to be sent to Committee Services by 10am. Committee Services produce & send draft agenda to Chief Exec, Monitoring Officer, Programme Director for Climate Change & Cabinet & Group Leaders 18/01/2024.

							<ul style="list-style-type: none"> • Chief Exec/Monitoring Officer/Programme Director for Climate Change/Cabinet briefing followed by an LCG meeting to approve reports and feedback to author. 22/01/2024 • Final Report to Committee Services by 10:00am 25/01/2024 • Despatch of Agenda 29/01/2024 • Date of Overview & Scrutiny Committee 06/02/2024 • Date of Cabinet meeting 08/02/2024 <p>To date we are on track with that delivery timeline.</p> <p>A new officer is being appointed for taking responsibility for complaints across the Council which the post is due to be advertised this week.</p>
<p>Recommendation 7 – Measuring performance:</p> <p>Develop performance measures and assurance reporting, in line with the above, to enable effective oversight to ensure building safety obligations are being achieved.</p>	Medium	30.04.24	30.04.24	SH	10% (10%)	In Progress	<p>Progress on this action is also detailed as part of Recommendation 5.</p> <p>Various output options being considered with work being done on simplifying and providing a consistent foundation to queries with database functions.</p> <p>Possible need to extend due date if opportunities to develop reports beyond Recommendation scope present themselves.</p>