



NORWICH City Council

Committee Name: Cabinet

Committee Date: 17/01/2024

Report Title: An update on Health, Safety and Compliance in Council Homes and Buildings

Portfolio: Councillor Jones, Deputy Leader and Cabinet member for Housing and Community Safety

Report from: Executive director of community services

Wards: All Wards

OPEN PUBLIC ITEM

Purpose

To provide an update to members about health, safety and compliance management and improvement in council homes and buildings.

Recommendation:

It is recommended that members note the new internal governance arrangements set out in Section 8 following the removal of the Regulatory Notice on the 13 December 2023.

Policy Framework

The Council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report addresses the following corporate priorities.

- People live independently and well in a diverse and safe city.
- Norwich has the infrastructure and housing it needs to be a successful city.

The Council's Housing Strategy '*Fit for the Future*' *A Council Housing Strategy for Norwich* sets priorities for the Council's homes and estates for the period 2020 to 2026. It identifies four primary goals, these are:

- Delivering new homes
- Maintaining and improving condition of existing housing
- Improving the use and management of our existing housing stock
- Improving our neighborhoods

The Council's Strategic Asset Management Framework 2022 sets out six policy themes including 'compliant and financially resilient management of assets'.

Report Details

1. Norwich City Council (NCC) is landlord of approximately 14,500 council homes and the freeholder for the buildings in which approximately 3,000 leaseholder homes are situated. It also owns over 300 non-housing assets in the general fund, some of which are let to multiple tenants and others which include multiple buildings within the asset (e.g., Eaton Park).
2. Registered providers of social housing (including councils and housing associations) are governed by the Regulator of Social Housing (RSH). The objectives of the RSH are set out in the Housing and Regeneration Act 2008. At the core of the RSH regulation is a set of standards which registered providers' landlords must comply with.
3. In November 2021, members considered the outcomes of a review by the RSH following the self-reporting by NCC on 28th July 2021 of a breach of the home standard. The RSH found that NCC had breached the Homes Standard and published a Regulatory Notice. The RSH did not feel it necessary to take enforcement action against NCC because they were assured of NCC's plans to improve services and return to full compliance.

Removal of the Regulatory Notice

4. Senior Officers have met with the RSH monthly, to report and discuss compliance progress. On the 13th of November 2023, NCC requested the removal of the regulatory notice, following a comprehensive programme to rectify the failures.
5. The RSH has considered the request, and they removed the regulatory notice on the 13th of December 2023, please see Appendix 1. The RSH stated the following:

'Following careful consideration of the information provided I can confirm that we are content that the evidence provided by the Council satisfactorily addresses the areas of non-compliance which led to the publication of the notice. With this in mind, we have taken the decision to discharge the Voluntary Undertaking which was accepted under section 125 of the Housing & Regeneration Act 2008. We will also now remove the regulatory notice which set out the Council's previous breach of the consumer standards.'

6. It was agreed in November 2021, that whilst the regulatory notice remained in place, a quarterly progress update would be provided to Cabinet. This is the seventh and final update to Cabinet and includes information up to the 31st of December 2023. Compliance will in future be monitored through the performance reports and the risk register as necessary.

New Internal Governance Arrangements

7. The Compliance Delivery Group (CDG) and the Health and Safety Compliance Board will continue to meet until the 31st of March 2024.

8. As a result of the removal of the regulatory notice, a new framework will be adopted to provide internal governance and assurance, which is as follows:

The Health and Safety Board - the Board has been established since 2022 and activity of the Health and Safety Compliance Board will be managed through the Health and Safety Board from the 1st April 2024.

As part of the transition the Health and Safety Board will meet to receive updated information, to consider progress, and agree further actions to be taken. The Board will have oversight of both housing, and non-housing property compliance within the NCC property estate. In January and February 2024, Senior Management will undertake a review of arrangements moving forwards.

The CDG have been invited to the Health and Safety Board in February and March 2024 to provide a detailed overview of the outstanding workstreams and risks to ensure compliance is successfully managed moving forwards.

The Housing Portfolio Holder will receive monthly performance information demonstrating compliance with the housing health and safety measures.

Compliance Improvement Plan

9. The compliance improvement plan (CIP) has been separated into housing and non-housing areas to support focused engagement with the RSH on housing matters and provide clear internal reporting of progress against identified actions across both areas.

Housing Compliance Improvement Plan

10. The table below provides a summary of progress for the Housing CIP which has two phases with activity prioritised based on risk assessment. The first phase was planned for completion by the 30.11.22 and the second by the 31.05.23.

Housing CIP Summary	Phase 1 – 30.11.22	
Activity	RAG September 2023	Update
Policies, procedures	100%	Final version of key compliance policies created and adhered to by staff.
Strategic oversight and governance	100%	Ongoing and meeting monthly to monitor progress.
Financial resources	100%	Complete
Staff and contractors	100%	Interim specialist resourcing in place.
Data management	100%	A comprehensive review of the block structures in NEC Housing has concluded and new hierarchies have been built.
KPI reporting and performance	100%	Business as usual reporting is in place.

Housing CIP Summary	Phase 2 – 31.05.2023	
Activity	RAG September 2023	Update
Staff and contractors	89%	A national campaign has launched to recruit senior leadership roles and appointments have been made for the Director of Property Services (Housing) and Head of Building Safety and Compliance and they are due to commence in March 2024. Interim senior management staffing arrangements have been extended to March 2024. The new structures for the Property Services function have formally took effect on the 27 th of November 2023.
Data management	83%	Work has commenced to build compliance programmes.
KPI reporting and performance	100%	Business as usual reporting is in place.
Requirements of the Building Safety Act	95%	A project has been initiated and a 6-month trial has been approved to create a forum to engage a Higher-Risk Residential Building (HRRB).
Information and advice to residents	88%	A project has been initiated and a 6-month trial has been approved to create a forum to engage a Higher-Risk Residential Building (HRRB).
Information, advice, and training to Members*	20%	Training delayed due to the providers availability and ascertaining suitable training dates for quarter 1 (2024).

11. The actions outstanding are reliant on several workstreams which have taken longer than originally anticipated.
12. To ensure the outstanding actions on the Housing CIP remain subject to scrutiny, the Compliance Delivery Group meetings have been extended to March 2024 and will continue to advise on progress to the Health and Safety Board.

General Fund Compliance Improvement Plan

13. General Fund (non-housing) properties were prioritised to ensure that resource is focused on high risk, high liability assets first. Assets have been split into one of the following groups:
 - High priority – properties we occupy or use for delivery of services or where we have full repairing and insuring liabilities (typically where the asset is multi-tenanted) or general fund properties with sleeping accommodation above.
 - Medium priority – tenanted properties where some repairing liabilities fall to us as the landlord, or low risk operational assets which have limited compliance requirements (e.g., surface car parks).
 - Low priority – tenanted properties where no repairing liabilities fall to landlord or unoccupied assets such as land / statues etc.

14. Non-housing properties are split between assets where the council is the responsible person for compliance and assets where the tenant is the responsible person for compliance. High priority assets are assets which are operational or vacant and therefore the Council is the responsible person and multi-tenanted assets where there is joint responsibility between the council and tenant. Most of the non-housing stock is tenanted, and statutory compliance responsibilities fall on the tenants. These assets are in the medium and low priority risk area. For high priority assets the compliance improvement plan is around 95% complete. Work is in progress to move towards BAU on high priority assets, this includes gaining new fire risk assessments, compartmentation, and fire door surveys on some assets, these have generated some new remedial actions on high priority assets which are being progressed (and fall outside the baseline figures used to calculate the 95% figure).
15. For high priority operational assets there are just a small number of remedial items left to resolve, these are in hand and contractors are lined up to resolve these. The team are now focusing efforts on lower risk operational assets, for example surface car parks and parks, these are all being visited to undertake a fresh audit of compliance requirements so far 33 sites have been visited.
16. In relation to tenanted properties, an initial letter and escalation letters (if required) were sent to tenanted assets asking tenants to supply compliance documentation, but the response rate was poor.
17. Therefore, a policy has now been adopted to manage compliance in tenanted properties and to provide escalation of tenant compliance issues. In summary, this involves:
 - a. Providing guidance and information to tenants on how to meet their compliance obligations and seeking confirmation from tenants that compliance documentation and remedial actions are up to date.
 - b. Undertaking visits to tenants (at least every other year) in order to improve tenant liaison and undertake a visual inspection of the property.
 - c. Escalate tenant compliance matters where there is evidence, following inspection, of compliance issues, initially via correspondence with tenants and then escalation via enforcing lease provisions. Not to take further actions where visual inspections do not identify evidence of compliance issues.
18. Initial visits to tenanted properties will commence in the new year once vacant posts have been recruited too. Action is however already progressing in relation to a small number of tenanted assets where there are known compliance matters which require resolution. Increasingly a number of issues are being identified with tenanted properties and the team are reviewing resource requirement to ensure we have the ability to drive forward the solutions once issues are identified.

19. A summary of the non-housing compliance improvement plan and progress is outlined below, which is planned for completion by the 31.01.2024:

Non-Housing CIP Summary – 31.01.2024		
Activity	RAG April 2023	Update
Asset prioritisation	100%	Complete
Staff and contractors	100%	Complete
High priority compliance mapping	100%	Complete
High priority landlord remedial works	95%	There are a small number of remaining remedials which are ordered with contractors and some new policies and procedures due to be adopted and rolled out shortly to allow completion. The position is the same as last quarter although the policies needed are in draft and contractors are now on site.
High priority tenant letters	100%	Complete
High priority tenant responses and action	100%	The action has been marked as complete, as team will adhere to the Tenant Compliance Policy. Where responses have been received these are however being worked through and action being taken to ensure tenant compliance.
Medium & Low Priority Compliance Mapping	60%	A fresh audit of sites is underway, the aim is to move this to a BAU dashboard for reporting to the Health and Safety Board.
Medium & Low Priority Landlord Remedial Works	75%	Most assets now visited with any new compliance requirements being instructed in tandem.
Medium & Low Priority tenant letters	100%	Complete
Medium & Low priority tenant responses and action	100%	The action has been marked as complete, as team will adhere to the Tenant Compliance Policy. Where responses have been received these are however being worked through and action being taken to ensure tenant compliance.
Legal Review of Leases	100%	Complete
Dashboard	50%	The aim is now to replace the dashboard with a BAU report for reporting to the Health and Safety Board.
Commercial tenant guide update	100%	Complete
Programmed maintenance review	100%	Programme is a live working document

Financial resources and controls	100%	Complete but subject to review and monitoring
Tenant escalation policy	100%	This is now complete

20. The actions outstanding are reliant on several workstreams which have taken longer than originally anticipated and they will continue to remain subject to scrutiny by the Health and Safety Board.

Housing Compliance Dashboard

21. To enable progress to be reported and monitored effectively, a compliance dashboard has been developed. The dashboard is updated monthly and reported to the Compliance Delivery Group and the Health, Safety and Compliance Board.
22. Overdue work and current work are monitored separately. All inspections and remedial works outstanding as of the 31st of December 2021 are 'overdue works'. All actions since that date are monitored to be completed within required timescales and are termed 'business as usual.' This approach has been agreed with the RSH.

Overdue Works

23. All works outstanding as of the 31st of December 2021, where access has been gained, have been completed across the following areas: gas safety; water hygiene; electrical safety, lifts, and asbestos.
24. Where access to a home has not been possible and has prevented work being completed the appropriate tenancy support/action is being taken to enable completion of works as swiftly as possible. The housing teams are undertaking this work.
25. The fire safety programme was completed on the 17th of October 2023, and the remaining actions relate to fire doors.
26. A fire door programme has been created and shared with the RSH, and the remaining actions will be completed by the 06th of September 2024.
27. The position as of the 30th of November 2023 is set out in the tables below:

	Position in Nov 2021	November 2023	RAG
Gas Safety	Compliant**	Compliant **	
Additional comments: All safety inspections have been completed as required			

	Position in Nov 2021	November 2023	RAG
Lifts	Compliant**	Compliant**	
	Additional comments: All safety inspections have been completed as required		

	Position in Nov 2021	November 2023	RAG
Water Hygiene	Up to 500 Water Hygiene surveys required	Compliant **	
	Additional comments: All safety inspections have been completed as required		

	Position in Nov 2021	November 2023	RAG
Asbestos	68 inspections required in communal areas	Compliant** HRRB management Surveys	
		Compliant** SpH management Surveys outstanding	
		Compliant ** LRB management surveys outstanding*	
	Remedial actions - position unknown	Compliant** HRRB remedial actions	
		Compliant** SpH remedial actions	
		Compliant** LRB remedial actions	
	Additional comments: All safety inspections have been completed as required		

	Position in Nov 2021	November 2023	RAG
Electrical Safety	105 Communal EICR's overdue	Compliant **	
	806 Domestic EICR's overdue	2 HRRB inspections overdue	
		Compliant** SPH inspections	
		18 LRB inspections overdue	
	Remedial actions position to be confirmed.	Compliant ** HRRB remedial actions	
		Compliant ** SpH remedial actions	
		2 LRB remedial actions overdue	

<p>Additional comments: The HRRB inspections outstanding are all cases where the contractor has not been able to gain access to the property; these are being progressed through the housing team where additional focused resources are now in place. Legal action to gain access will be taken where necessary.</p> <p>All priority 1 and 2 remedial actions arising from inspections are now being completed at the time of the inspection to enable certification to be achieved without delay. Overdue remedial actions in all areas are reducing.</p>		

	Position in Nov 2021	November 2023	RAG
Fire Safety	All HRRB FRA's completed.	Compliant** HRRB inspections	
	2 SpH overdue FRA's	Compliant ** SpH inspections	
	650 LRB FRA's outstanding (Please note, incorrect number was initially reported)	Compliant ** LRB inspections	
		3 HRRB remedial actions overdue	
		5 SpH remedial actions overdue	
		111 LRB remedial actions overdue	
<p>Additional comments: Fire risk assessments (FRA) for all high-risk residential buildings, specialist housing and lower risk buildings have been completed.</p> <p>Contractors have been appointed to undertake the outstanding remedial works and these are gradually reducing, but there are some access issues to individual properties.</p> <p>In addition to the original 1700 FRAs required, a further 570 sites required an external wall assessment but no FRA (as no communal area). These have now all been assessed by the contractor.</p> <p>There have been 4 additional operational assets identified and added into the contract, along with 3 commercial sites where NCC are the landlord and responsible for the communal areas/means of escape. These have now had FRAs carried out.</p> <p>All HRRBs have now been registered with the Building Safety Regulator (BSR) and work is ongoing preparing building safety cases for all in scope premises. Draft Building Safety case(s) (BSC) for the 1st block is progressing and almost complete, and intrusive surveys have been carried out on the towers cladding system and revealed a limited amount combustible cladding which is currently being removed. Fire engineers have been appointed to provide final Fire Risk Assessment External Wall (FRAEW) using PAS9980 methodology.</p> <p>As part of the fire risk assessment process, we have commissioned surveys of some of the fire doors within our blocks. These surveys highlighted some concerns with the quality of the installation and the materials that had been used. After further specialist assessment and testing, we have identified that some doors may not perform as required in the event of a fire. We have updated our fire risk assessments to reflect this and shared our findings with the Norfolk Fire and Rescue Service (NFRS). We have put in place a series of measures to mitigate the risks associated with the doors and have</p>			

	written to our affected residents to share some updated advice and to arrange to visit their home. We are working closely with NFRS to assist any vulnerable residents that we identify, and NFRS have been supportive of the approach that we have taken so far. We have also shared information with the RSH and will continue to share our progress with them during our monthly meetings. A replacement door programme has now been agreed and is likely to commence in January 2024. This will be prioritised based on risk, starting with HRRB, followed by Sheltered schemes and then the low-rise blocks.
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Please note the following abbreviations:

HRRB	High Risk Residential Building
SpH	Specialised Housing
SpH LL	Specialised Housing Landlord service
SpH Dom	Specialised Housing domestic property
LRB	Lower risk Buildings
FRA	Fire risk assessment

** Properties are compliant if they have a safety certificate or are being managed in accordance with the council's no access process.

Non housing assets data

28. To enable progress to be reported and monitored effectively, a non-housing compliance dashboard has been developed. The dashboard is updated monthly and reported to the Health, Safety and Compliance Board. The team are now reviewing how this can be moved to a BAU dashboard with the view that in the future this is reported to the Health and Safety Board.
29. Progress against the non-housing compliance dashboard has accelerated in the last two months following the improvement of data. However, that data is still currently held in shared folders and spreadsheets. An improved IT system is required and has been procured, the first phase which involves an online database of assets will go live in January. System development in due course will enable reporting on programmed maintenance and compliance. The details and timescales for this are being mapped out.
30. The current position in terms of high-risk operational building compliance is recorded in the table below. There remain 4 outstanding matters which is the same as last quarter, these are in hand but taking slightly longer to resolve, partly due to delays with contractors. Contractors are now lined up with a start date for these and one item requires review of policy which is being taking forward by the Health and Safety Board.
31. High risk operational building compliance:

Fire	1 high risk and 2 medium risk actions remain, orders and action plans are in place to resolve this last remaining actions.
Electrical	All condition reports are up to date 1 remaining remedial with order raised to resolve.

Water	All buildings have an up-to-date risk assessment with no outstanding actions
Asbestos	All buildings have been surveyed and no high-risk material outstanding.
Gas	Gas servicing is up to date
Lifts	All lifts have up to date service records and are on a service/inspection plan.
Fire Installations	All up to date

Compliance Risk Register

32. The Health, Safety and Compliance Board has developed a risk register that is reflected through into the Council's corporate risks. The register is regularly reviewed and has been updated and approved by the CDG, whilst the HSCB will review the risk register in January 2024.

Next Steps

33. The compliance team will continue to collaborate closely with colleagues in housing management and tenancy support to ensure access is gained to properties to conduct the necessary inspections and works, whilst minimising inconvenience to residents.
34. Outstanding actions on the Housing CIP, which have not been completed in line with deadlines will be addressed. Please note, the deadlines will remain subject to scrutiny by the Compliance Delivery Group and the Health and Safety Board to ensure progress is made.
35. A training programme will continue and is being developed for all with responsibility and accountability for compliance.
36. Work is continuing to secure appropriate permanent staff for senior management roles and appointments have been made for the Director of Property Services (Housing) and Head of Building Safety and Compliance and they are due to commence in March 2024.
37. Commission a data audit and a review of data governance upon completion of the compliance programmes.
38. The Compliance Delivery Group will provide a report to the Health and Safety Board in February and March 2024 to provide a detailed overview of the outstanding workstreams and risks to ensure compliance is successfully managed moving forwards.

Engagement

39. Web content has been kept up to date to provide additional information and helpful FAQ's relating to the key issues.
40. Residents have several different options to contact us about compliance and to raise any questions or concerns.
41. In February 2023, Senior Management will inform the Tenant Involvement Panel of key aspects of the programme of works where applicable.
42. For tenanted non-housing properties, tenants have been contacted to ensure they are familiar with their compliance responsibilities and that these are aligned with the Council's responsibilities as landlord.

Implications

Financial and Resources

43. This report is to provide an update on the expenditure against the additional resources allocated to the compliance budgets.
44. On 12th November 2021, Cabinet approved budget virements to create additional 2021/22 revenue budgets of £1.272m to support the CIP and approved the creation of a new HRA Compliance earmarked reserve that enabled any unspent revenue budgets at the end of 2021/22, to be carried forward and utilised in 2022/23. In addition, on 30th November 2021, Council approved an increase to the 2021/22 HRA capital programme of £1.000m, with the intention that approval would be sought for any underspend to be carried forward through the usual capital carry-forward process for utilisation in 2022/23.
45. The revenue underspend of £0.840m in 2021/22 was moved to an earmarked reserve to support additional expenditure in 2022/23. The capital underspend of £1.000m was carried forward and to enable further capital expenditure in 2022/23. In addition, HRA revenue budgets totaling £0.662m plus an HRA capital budget of £1.000m were approved as part of the 2022/23 HRA budget.
46. At the end of 2022/23, the compliance revenue outturn was £0.662m leaving £0.713m remaining in the compliance earmarked reserve and the capital underspend of £1.3m was carried forward to enable further expenditure in 2023/24. In addition, £0.459m of revenue budgets and a £1.000m capital budget were approved for 2023/24 to support ongoing compliance work.
47. The 2023/24 budget position as at period 9 (31st December 2023) is shown in the tables below:

Revenue Cost	Compliance Earmarked Reserve £	2023/24 Compliance Budget £	2023/24 Current Actuals £	Remaining Revenue Funding £
Additional Specialist Resource	408,387	258,505	338,695	328,197
Compliance Remedial works	304,561	200,000	104,222	304,561
Total	712,948	458,505	442,917	632,757

Capital Cost	2022/23 Underspend Brought Forward	2023/24 Compliance Budget £	2023/24 Current Actuals £	Unspent Budget to date
HRA Major compliance upgrades	1,300,000	1,000,000	325,376	1,974,624

Legal

48. The legal implications of the RSH notice and process were established in the report to Cabinet on 12 November 2021. The position remains unchanged for the purpose of this update report.
49. Legal advice has been obtained with regards to the respective Council and tenant responsibilities relating to leased properties in the general fund. We are continuing to review the position and take further advice regarding responsibilities based on individual responses from tenants and the relevant lease terms.

Statutory Considerations

Consideration	Details of any implications and proposed measures to address
Equality and Diversity	None
Health, Social and Economic Impact	None
Crime and Disorder	None
Children and Adults Safeguarding	None
Environmental Impact	None

Risk Management

50. The critical risk register for this project is attached in Appendix 2.

Other Options Considered

51. This is an update report following decision made by cabinet in November 2021.

Reasons for the decision/recommendation

52. Following a comprehensive programme to rectify the compliance failures, the RSH has removed the Regulatory Notice. NCC are committed to ensure compliance is successfully managed moving forwards and will adopt a new framework. The new framework provides internal governance and assurance for the long-term sustainability of maintaining compliance in the future.

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Appendix 1

Norwich City Council's compliance with the regulatory standards



Regulator of Social Housing

Level 1A – City Tower
Piccadilly Plaza
Manchester M1 4BT

T: 0300 124 5225
E: enquiries@rsh.gov.uk
W: www.gov.uk/rsh

12 December 2023

Louise Rawsthorne
Chief Executive
Norwich City Council

Sent by email to: louiserawsthorne@norwich.gov.uk

Dear Louise

Norwich City Council's compliance with the regulatory standards

I am writing in relation to Norwich City Council's request to remove the Regulatory Notice, published in October 2021, which concluded the Council's non-compliance with our consumer standards.

Following careful consideration of the information provided I can confirm that we are content that the evidence provided by the Council satisfactorily addresses the areas of non-compliance which led to the publication of the notice. With this in mind, we have taken the decision to discharge the Voluntary Undertaking which was accepted under section 125 of the Housing & Regeneration Act 2008. We will also now remove the regulatory notice which set out the Council's previous breach of the consumer standards. This is scheduled for Wednesday 13 December 2023 at around 9.30am.

In the meantime, I wanted to thank you and your colleagues for the positive and constructive engagement. Lastly, you are welcome to share the contents of this letter as confirmation of our conclusion in advance of the removal of the regulatory notice from our website.

If you have any questions or it would be helpful to discuss, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in blue ink that reads "Jonathan Driscoll".

Jonathan Driscoll
Assistant Director Regulatory Engagement



Appendix 2

Risk Management

A detailed project risk register has been developed. Set out below are the overarching and critical risks to the compliance programme.

Risk	Consequence	Controls Required
Inadequate systems to record and manage data.	Inaccurate information resulting in insufficient progress in key areas and ineffective management of Health and Safety Compliance. Serious detriment to tenants/ leaseholders.	Risk based programme in place. NEC system implementation. Skilled additional capacity.
Lack of contractor supply chain capacity.	The CIP cannot be delivered swiftly, and tenants remain at risk for an extended period.	Widen the pool of contractors being used. Work with EPL to identify potential contractors.
Skills and expertise not sufficient to manage the program in NCC.	Delayed decision making and inability to progress the work required. Tenants remain at risk for an extended period.	Skilled temporary resources to oversee the programs of works are in place. Undertake permanent recruitment of key posts.
Loss of experienced staff currently delivering compliance activity.	Compliance catch up works not progressed in a timely way.	A new structure has been implemented. Undertake required training of key staff.
Incomplete or out of date policies and procedures.	Actions are incorrect, not meeting statutory requirements. Inadequate support for staff.	Policies and procedures updated and being adhered to by staff.
Undertake a quality review, back 5 years, of all Fire Safety improvement works	Poor quality work does not meet the required standard. Tenants remain at risk	Validation of existing data through the annual inspection programme. Targeted surveys by specialist Fire safety contractor.