

HOUSING – ANNUAL COMPLIANCE REPORT

1. RECOMMENDATION

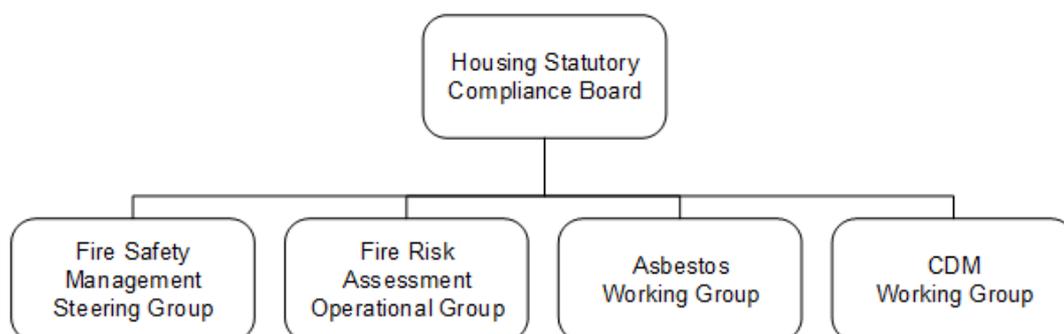
- 1.1 It is recommended that the Housing and Communities Overview and Scrutiny Panel note the Housing Compliance Annual Report covering the period up to 30 June 2024 in respect of the Housing Services' performance against key statutory compliance measures.

2. INTRODUCTION

- 2.1 This report provides the next scheduled update to Members on Housing compliance performance across a range of statutory safety requirements in respect of the Council's housing stock. The Council's Executive Management Team also considered the report at their meeting held on 15 May 2024.
- 2.2 This report also provides an update on the requirements of the new Section 156 of the Building Safety Act 2022, work to identify Reinforced Autoclave Aerated Concrete (RAAC) within housing buildings and update on Damp, Mould, and Disrepair.

3. BACKGROUND

- 3.1 Compliance with statutory safety standards is a high priority across the Housing Service. In recent years there has been enhanced reporting of compliance performance with an annual report taken to the Housing and Communities Overview and Scrutiny Panel, and twice annual reports to the Council's Executive Management Team.
- 3.2 The Housing Service introduced a Statutory Compliance Board in April 2023. The board meets every quarter to receive, monitor and appraise management information and data in respect of the Council's Housing statutory compliance functions.



- 3.3 The new social housing regulatory regime, implemented through the Social Housing Residents' Charter, the recent introduction of Tenant Satisfaction Measures (TSMs), the new Social Housing Regulation Act from April 2023 and new Consumer Standards, places greater emphasis on tenant safety, and brought about a range of new significant measures to improve the services provided to tenants by registered providers. All registered providers now report annually to the Regulator of Social Housing on a wide range of matters, including performance with statutory compliance measures.

- 3.4 The Housing Service introduced a suite of M365 dashboards in April 2023, providing key performance and analytical data across a range of activities which are monitored monthly by the respective managers:
- 3.5 All providers who own 1,000 or more units of social housing are required to report their TSM data to the Regulator of Social Housing by 30 June 2024, with performance league tables for all landlords expected to be published in the Autumn of 2024. The Council was an early adopter of the regime and has benefited from early reporting of TSMs resulting in performance improvements during the year. The Council's data has been submitted and published on 8 July 2024 here [TSM Publication – External website](#).
- 3.6 The Housing Compliance Teams, operate under a suite of policies covering the core statutory compliance areas as follows: -
- Control of Asbestos
 - Control of Contractors
 - Electrical Safety
 - Fire Safety
 - Gas Safety
 - Legionella
 - Lifts and Lifting Equipment
 - Mobility Scooters
 - Playgrounds and Play Equipment
- 3.7 Periodic Policy reviews are underway, and include new policies covering Condensation, Damp and Mould and Tenant Recharges, which are expected to be completed by the end of August 2024.

4. DAMP, MOULD, AND DISREPAIR

- 4.1 The Housing Ombudsman Service published its Spotlight Report on damp and mould in October 2021 following the appalling and preventable death of Awaab Ishak and sent an open letter to all member landlords on 29 November 2022. A further Spotlight Report was published in February 2023, alongside guidance on Pre-Action Protocol for Housing Conditions Claims and service complaints.
- 4.2 Awaab's Law entered parliament through Clause 42 within the Social Housing (Regulation) Act in July 2023. It forms part of the government's White Paper pledge to reduce non-decency in rented homes by 50% by 2030. Awaab's Law entered its consultation phase on 9 January 2024 for 8 weeks and is now complete, the outcome of which will help shape Housing's new Condensation, Damp and Mould Policy.
- 4.3 The Council is committed to providing safe, secure, and comfortable homes for all our Housing Tenant's and recognise that damp and condensation can lead to subsequential mould growth, and the impact this has on health and wellbeing.
- 4.4 In the 12-month period commencing Autumn 2022, the Housing Service received 546 reports of damp/mould, and in the 12-month period commencing Autumn 2023, a further 354 were received.
- 4.5 Over the past 18 months, significant effort has been made to tackle reports of damp and mould, with new procedures implemented which respond effectively to the initial report, cause identification, resulting repairs and where necessary, delivery of new

preventative educational guidance and ongoing support to tenants. This has included initial commissioned specialist cleaning services.

4.6 The key processing activities in our effort to tackle reports of damp and mould are set out below: -

- a) Customer Contact Triage Workflow
- b) Triage Risk Matrix to determine response priority.
- c) Triage script
- d) Website MS Form for e-reporting
- e) Automated email responses built into Touchpoint for Customer Services
- f) Database to record, track, and monitor outcomes of reports and identify repeat reporters.
- g) Dedicated damp, mould, and condensation website information page
- h) New Tenant information guides and advice leaflet

[Damp, mould, and condensation - New Forest District Council](#)
[Final Damp and mould booklet - A5 \(newforest.gov.uk\)](#)
[Damp and mould - Advice leaflet \(newforest.gov.uk\)](#)

4.7 Tailored tiered training delivered to identified housing staff: -

Tier one Customer Services and Workforce Planning staff
Tier two All visiting Officers.
Tier three HHSRS training for inspectorate staff
Overview and responsibilities – All staff in staff meetings

4.8 The Council is currently dealing with 14 active cases of disrepair, where a letter of claim has been served under the Pre-Action Protocol for Housing Conditions Claims. These are being managed through the legal process and supported by Legal Services.

5. QUALITY ASSURANCE AND PROFESSIONAL MEMBERSHIPS

5.1 GAS SAFE

5.1.1 The Gas Safe Register is the official list of gas engineers in the United Kingdom, who can work legally on gas appliances and installations and deals with all aspects of the downstream gas industry regulations and operates under an agreement with the Health and Safety Executive (HSE).

5.1.2 The Council is a registered Gas Safe Business, employing 15 registered engineers (including Gas Manager and Gas Supervisor). These Engineers receive training every 5 years to maintain their core competencies, and the Council has to re-register with Gas Safe each year, including the register of Gas Engineers operating under the Council's registered business.

5.1.3 Membership provides the Council with access to technical support, exclusive use of the Gas Safe brand, access to individual Gas Safe Register ID cards and Engineers who can self-certify and notify work required under Building Regulations.

5.1.4 The Council commissions third-party Corgi Accredited rolling quality assurance assessments on a minimum of 5% of the work carried out by the Council's gas engineers each year. The assessment regime allows the Council to monitor performance against regulatory standards, national benchmarking for continuous

improvement and gives assurance that identified issues are dealt with promptly and appropriately. In addition, the Council's Gas Supervisor holds a Level 3 VRQ Certificate in Gas Auditing Processes.

5.2 NATIONAL INSPECTION COUNCIL FOR ELECTRICAL INSTALLATION CONTRACTING

5.2.1 The National Inspection Council for Electrical Installation Contracting (NICEIC) is the largest voluntary register of electrical businesses and assesses over 36,000 registered businesses to ensure that installation work they undertake meets the standards expected.

5.2.2 The Council is a registered business under the NICEIC Approved Contractor Scheme employing 12 registered engineers (including the Electrical Manager and Electrical Supervisor who take the role of registered Qualified Supervisors). These engineers receive training at each edition update of The IET Wiring Regulations to maintain CPD and competency.

5.2.3 Membership provides the Council with access to technical support, exclusive use of the NICEIC brand, and Engineers who can self-certify and notify work required under Building Regulations.

5.2.4 Both of these registration schemes require periodic inspection regimes, typically at 3 yearly intervals, to assess that employer businesses have robust safety management processes and/or procedures in place and that these are producing safe work, coupled with selective field work inspections to ensure competency of Engineers.

5.2.5 The last audit of the Council's gas business activities took place in July 2021 providing a satisfactory rating, and on the 4 April 2024, an audit of the Council's electrical business activities was undertaken by the NICEIC. The NICEIC audit report is expected shortly and the next periodic audit by Gas Safe is likely to be undertaken during 2024.

5.3 ASSOCIATION OF SAFETY AND COMPLIANCE PROFESSIONALS

5.3.1 The Association of Safety and Compliance Professionals (ASCP) is the leading professional membership organisation for asset safety management and compliance within social housing and facilities management.

5.3.2 The Council joined the scheme in 2019 with member benefits including, twice yearly technical meetings with peer groups and subject matter experts, discounted qualifications/courses, regular industry updates and news, access to online resources – technical bulletins, regulatory updates, and presentations. It also provides networking opportunities for benchmarking, learning, and to consider new initiatives or practices within the market to further improve compliance regimes.

5.4 SOUTHERN INTERNAL AUDIT PARTNERSHIP

5.4.1 Regular reviews form part of the Council's annual internal audit plan with Southern Internal Audit Partnership. During the financial year 2023/24, reviews have been undertaken on the Council's statutory safety management arrangements for Housing Asset Management of Legionella and Electrical Safety and the reports, alongside recommendations and management responses were published in June 2023 and February 2024 respectively, with both given a 'Reasonable' assurance opinion.

6. KEY COMPLIANCE MEASURES

6.1 ASBESTOS

- 6.1.1 Following a review of the Council's approach to asbestos in 2020/21, several recommendations were implemented, including the adoption of a new Asbestos Policy in October 2021.
- 6.1.2 The Asbestos Policy ensures that there is clarity in terms of structure and responsibility for asbestos across the Council, with an established Asbestos Working Group overseeing the Council's approach to ensure good practice.
- 6.1.3 The Housing Service take a lead role in ensuring a consistent approach across the whole Council, with individual Service Managers being required to comply with the same policy for the property assets falling within their respective areas of responsibility.
- 6.1.4 The Council established a multi-supplier 4-year framework in April 2021 for the provision of providing specialist asbestos related works and services, including surveying, analytical work, training and asbestos removal.
- 6.1.5 There is an ongoing training programme to ensure that staff who are likely, in the course of their duties, to come into contact with asbestos or who may have responsibility for managing it, are appropriately trained.
- 6.1.6 A programme of surveys on all communal areas of housing blocks was commissioned and completed in 2022. A full reinspection programme was completed by the Council's Asbestos Management Officer in 2023, with one block outstanding, namely, Robertshaw House due to ongoing fire safety improvement works. The 2023 reinspection survey programme also covered all Housing garage sites using survey data gathered by ABP in 2017. The 2024 reinspection programme is now progressing on time, covering all Housing blocks and garages, undertaken by the Council's Asbestos Management Officer.
- 6.1.7 Asbestos management surveys are carried out on all void social housing properties (approx. 350 each year) prior to any maintenance work commencing, which also enables us to provide asbestos information guides to the incoming tenants.
- 6.1.8 All refurbishment surveys required to support capital planned maintenance works, i.e., kitchens, bathrooms etc. are now commissioned under one survey to cover both asbestos management and refurbishment, which in time will improve asbestos management data held on individual housing dwellings.
- 6.1.9 A programme of surveys on all corporate buildings, including offices, depots, public conveniences etc., where maintenance and repairing responsibilities rests with the Council were commissioned in Jul 2022 and concluded in November 2022. The Council's first ranked Asbestos Services Framework provider, Allium Environmental carried out these initial surveys, and were reinspected in 2023 by Casa Environmental, also via our Asbestos Services Framework. The Council's Asbestos Management Officer is planning to commence the 2024 annual reinspection programme later this year.
- 6.1.10 The Council's Asbestos Team launched three new M365 e-form databases covering asbestos surveying, analytical and abatement requests, aiding the tracking and delivery oversight of all requests with our commissioned asbestos framework providers. These have been published on both the Housing's SharePoint site and Forestnet with several briefing sessions held for staff.

6.1.11 Keystone Mini is a mobile app containing a simple version of our asset management system records allowing staff to have immediate access to asbestos information from any location. We have identified circa 178 staff across council services who require access, with housing trade staff identified as the priority group which has now been deployed. This will be a major benefit allowing immediate access to asbestos information for trade staff 'out in the field' to help prevent any exposure incidents. Mobilisation and deployment to other staff group's is nearing completion.

6.2 ELECTRICAL SAFETY

6.2.1 The Council is required to carry out periodic electrical installation safety inspections on all housing stock, including communal landlord supplies every 5 years, and at a change of tenancy, as recommended by BS 7671 IET Wiring Regulations. These are carried out by the Council's Housing Maintenance Service using the in-house team of qualified electricians.

6.2.2 During the period August to October 2023, a large-scale housing records reconciliation programme was undertaken across all electrical compliance activities and the current position across the various compliance area headings are set out below: -

DOMESTIC

6.2.3 The reconciliation programme concluded in October 2023 found 115 inspections overdue and a further 201 properties with missing certification. Whilst it can be assumed these properties were inspected, and due to a transfer to a new system some certificates may not have been uploaded, it is important to hold the appropriate paperwork. To address the urgency of missing certification, external electrical contractors were commissioned to support the Council in reinspecting these properties.

6.2.4 As of 18 June 2024, from a total of 5,279 5-year cyclical inspections there are currently 48 inspections overdue, and a further 30 properties from the original 201 properties with missing certification. Of these, 52 have appointments, 9 awaiting certification, 8 being progressed to appointment and 5 have been escalated to the Housing Estates team to support engagement with tenants to gain access and a further 4 escalated to legal services to seek an injunction.

Compliance currently sits at **98.27%**

LANDLORD COMMUNAL

6.2.5 The Council has 166 housing blocks with communal power and/or lighting (31 share supplies from adjoining blocks). Of these landlord electrical installations 6 are overdue having been last inspected in late summer 2018. It has been identified that the Landlord supplies to 5 of these are located within internal stores within residents' flats and attempts are being made to access these (Nb. these also supply a further 5 adjoining blocks). The remaining block is currently undergoing fire safety improvement works including electrical upgrade works. 14 further blocks were inspected during 2023/24 Q4, of which 7 were found to be unsatisfactory with remedial work identified underway by external electrical contractors.

6.2.6 In the absence of the Council's Electrical Manager due to ill health, a working group has been established to support the Electrical Supervisor and management of external commissioned electrical contractors.

Compliance currently sits at **93.37%**

6.3 FIRE SAFETY

BACKGROUND

- 6.3.1 Housing Services adopted a new Fire Safety Policy in 2019 which set out a process for obtaining fire risk assessments and the intervals when these are due. The Policy was updated in August 2022 to incorporate changes in national guidance, taking expert advice and picks up relevant staffing changes within the Council's Housing Service. The Fire Safety Policy requires:
- an annual fire risk assessment (FRA) to be carried out in respect of the Council's Extra Care blocks of accommodation, as well as its hostels; these being higher risk properties and,
 - 3 or 5 yearly fire risk assessments in respect of other general needs blocks of accommodation depending on their characteristics and occupancy restrictions.

- 6.3.2 In December 2022, the Council appointed an external specialist to undertake cyclical FRAs to the Council's housing blocks and corporate buildings for the next 3 years. FRAs are undertaken on a rolling basis continually throughout the year and there are always likely to be outstanding actions reported. Each FRA is reviewed within 14 days of completion and high-risk actions scheduled as a priority.

- 6.3.3 The Council set up a Fire Safety Operational Group to progress and coordinate all the necessary actions, through three workstreams. These workstreams have been prioritised depending on the nature and characteristics of the properties and are set out below: -

Workstream A - covers the actions in the 3 Extra Care Blocks of accommodation, the 3 historical hostels and 16 number of age restricted blocks of accommodation which have communal lounges and laundry rooms.

Workstream B – Covers 90 blocks considered to be lower risk, as they have limited communal accommodation, largely consisting of communal stairways, and low numbers of vulnerable residents.

Workstream C - Covers the remaining 80 lowest risk blocks of accommodation, most of which have their flat entrance doors open to the air, rather than a communal corridor.

The balance of 18 blocks includes new build developments or recent conversions where no fire risk actions have been raised.

- 6.3.4 The Council is using a combination of in-house resources and external contractors to deal with the necessary actions. During 2022/23 and 2023/24 the Council will have spent £5 million on fire safety and statutory compliance matters. Further funding of £1 million has been allocated for 2024/25 within the Housing Public Sector Capital Expenditure Programme.
- 6.3.5 The Council has retained the services of project management consultants and a fire safety specialist who is assisting the Council and is working closely with the Fire Service through the Joint Fire Steering Group Liaison Meetings.

PROGRESS AGAINST PLAN – Workstream A

- 6.3.6 A programme of work commenced in the Spring of 2022 on the 3 Extra Care blocks to deal with compartmentation issues, install a new fire alarm system including a Telecare system (to ensure communication between tenants and the onsite care provider), replacement fire doors to dwellings, ancillary and cross corridor doors and other remedial works. Forming part of this work, the Council piloted a newer innovation, in the form of a fire suppression system, i.e., a sprinkler system in Barfield Court. This decision was taken due to the shallow roof pitch of the building, which made it difficult to insert traditional compartmentation materials.
- 6.3.7 The fire safety work to Barfield Court has now been completed. Following further intrusive investigations at Gore Grange, additional fire stopping work was identified as being necessary within individual flats and a separate report regarding this matter was considered by the Executive Management Team on 20 July 2023. The additional work to individual flats requiring the temporary displacement of residents was concluded in December 2023, with all fire safety work completed in January 2024.
- 6.3.8 More recently the decision has been taken to further enhance the scope of fire safety work at Winfrid House, Totton to include fire suppression and the remodelling of the decommissioned commercial communal kitchen to provide more suitable laundry facilities, a new pump room and office accommodation for the onsite care provider. This will extend the current project which is now expected to be fully concluded by the end of July 2024. This decision will future proof both Barfield Court and Winfrid House pending a wider review of Hampshire County Council commissioned extra care services within the district.
- 6.3.9 There was a need to temporarily decant 2 buildings (Compton House and Sarum House in Totton) to enable necessary safety work to be undertaken. A two-phase programme of work commenced in the Spring of 2022, and officers made arrangements with each tenant of these two buildings to ensure they were adequately housed elsewhere to facilitate the completion of the initial phase over a period of 6 weeks. Tenants returned to Compton House in late May and Sarum House in early August 2022. The second phase of work at Compton House commenced early October 2022 and Sarum House in early January 2023. In addition to the necessary fire safety work including 120 replacement fire doors, the scope was extended to include replacement external doors, windows and roof coverings and internal communal decoration, floor coverings and lighting improvements. Sectional Completion was issued on 4th October 2023, with some further additional work identified due to be completed imminently.
- 6.3.10 There was also a need to temporarily decant a further building (Robertshaw House in Lyndhurst) to enable necessary safety work to be undertaken. The work necessary within this block replicates that of Compton and Sarum House. A two-phase programme of work commenced in the May 2023, and Officers made arrangements with each tenant of these two buildings to ensure they were adequately housed elsewhere to facilitate the completion of the initial phase over a period of 6 weeks. Tenants returned to Robertshaw House in early August 2023.
- 6.3.11 The second phase of work at Robertshaw House commenced early September 2023, but was temporarily halted as a precautionary measure following the discovery of a bat within the open roof void. ABR Ecology were commissioned, and an Ecology survey was carried out on 5 October 2023. A Policy 4 EPSL Licence application was approved by Natural England on 30 January 2024, to cover all external, internal roof void and replacement roof covering work during bat roosting season, alongside an Ecology report to accompany the planning application, approved by the NFNPA on 19 December 2023. All internal work below the roof void line recommenced in

January 2024 following agreement with the Ecologist and is nearing completion, and the reroofing work commenced in late February and was completed in late April 2024. The overall programme is being monitored closely to mitigate risk and is expected to complete early August 2024.

- 6.3.12 Retrofitted glazed screening enclosing what were originally open balcony walkways on 2 further housing blocks has been removed. Further remediation work is currently in the planning phase and subject to building control approval.
- 6.3.13 Work to retrofit 32 double glazed panels with smoke vents within the stairwells at 7 North Milton Housing blocks has also been completed. A modification to the building control application has been approved to install separate fall safety guarding and discussions with Building Control are underway to install this as soon as reasonably practicable. Smoke vents within stairwells are used as a method to effectively expel smoke, heat and fumes in the event of fire breaching a compartment to the means of escape.
- 6.3.14 The Council will shortly be commissioning a contractor for further ongoing consultancy services to support the work at 3 further age restricted blocks, namely, Evergreens – Totton, Whitecroft – Hythe and Clarks Close - Ringwood as part of the ongoing programme.

PROGRESS AGAINST PLAN – Workstream B

- 6.3.15 All blocks of accommodation (across all 3 workstreams in 5.3.3) requiring door inspections and/or fire stopping surveys, are being arranged and completed according to priority as follows:- those blocks where records show that the doors may be non-compliant being treated as a top priority; those that have notional fire doors (i.e. doors that met the standard when the block was originally built) but require inspection to ensure the doors still operate as a fire door; and then other doors, which records show were compliant at the time of installation, but require inspection to ensure they have not been damaged since then.
- 6.3.16 The key elements of fire safety improvement work completed within Workstream B includes circa 50 ad hoc replacement fire doors, upgrading electrical meter boxes and loft hatches within common means of escape, fire stopping, fire signage and ongoing monitoring and clearance of common areas to maintain sterile environment.

THE FIRE SAFETY (ENGLAND) REGULATIONS 2022

- 6.3.17 The Fire Safety (England) Regulations 2022 have now been introduced. The Regulations were introduced under Article 24 of the Regulatory Reform (Fire Safety) Order 2005 and came into force on 23 January 2023 and apply to high-rise buildings, residential buildings with storeys over 11 metres in height and all multi-occupied residential buildings with two or more sets of domestic premises. Although the Council does not have any high-rise or buildings with storeys over 11 metres within its housing stock, the regulations do apply to all multi-occupied residential blocks of flats and requires the Council as Landlord and ‘Responsible Person’ to:
- Provide tenants with information relating to the importance of fire doors in fire safety, and
 - Provide relevant fire safety instructions to tenants, which includes instructions on how to report a fire and any other instruction which sets out what tenants must do once a fire has occurred, based on the evacuation strategy for the building.

6.3.18 The Council included a fire door specific article in the Winter 2022 Hometalk edition (sent to all tenants) and wrote to all affected tenants individually on 20 January 2023, enclosing an information leaflet. Fire door safety information is published on the Council's website and is included within the sign-up process for new tenancies. The Council's website provides a range of relevant self-help advice for tenants and fire safety remains a regular article feature in Hometalk.

THE BUILDING SAFETY ACT 2022 – SECTION 156

6.3.19 Section 156 of the Building Safety Act 2022 was introduced under Article 50 of the Regulatory Reform (Fire Safety) Order 2005 and came into force on 1 October 2023 and applies to all non-domestic premises, such as where people work, visit or stay, including workplaces, and the non-domestic parts of multi-occupied residential buildings (e.g., communal corridors, stairways, plant rooms). The requirements do not apply within individual domestic premises.

6.3.20 Local fire and rescue authorities remain the primary enforcing body for the Fire Safety Order, including these additional requirements. The Housing Act 2004 lists enforcement by the Local Authority in non-domestic parts of multi-occupied residential buildings.

6.3.21 The new legislation had the effect of amending the Fire Safety Order to: -

- require that all Responsible Persons record their completed fire risk assessment, and in full.
- require that all Responsible Persons record the identity of any individual (their name), and/or if applicable, their organisation (name) engaged by them to undertake/review any or all the fire risk assessment and share this with residents of multi-residential unit premises where applicable.
- require that all Responsible Persons record their fire safety arrangements.
- require that all Responsible Persons record (and as necessary update) their contact information, including a UK-based address, and share this, along with the identified fire safety risks, preventative and protective measures, any competent persons nominated to assist with firefighting and detection measures, with other Responsible Persons and residents of multi-domestic unit premises where applicable.
- require that all Responsible Persons take reasonably practicable steps to ascertain the existence of other Responsible Persons who share, or have duties in respect of the same premises, and of Accountable Persons (which are a new legal entity made under the Building Safety Act in the case of higher-risk residential buildings) in relation to the premises – they must then identify themselves to said persons and cooperate with accountable persons so that the accountable persons can carry out duties imposed by the Building Safety Act 2022.
- require that departing Responsible Persons share all 'relevant fire safety information' with incoming Responsible Persons.
- require Responsible Persons of a building containing two or more sets of domestic premises to provide residents with relevant fire safety information in a format that is easily understood by the residents.
- increase the level of fines for some offences.
- strengthen the status of statutory guidance issued under Article 50 of the Fire Safety Order.

6.3.22 Housing Services have stringent procedures in place relating to the commissioning of fire risk assessments by commissioned external experts and their recording. There are several additional requirements set out above which senior housing managers are working through via a dedicated Council wide Officer Working Group, particularly

around the sharing of FRAs and actions with tenants as these are 'live' documents, with actions being frequently updated. The Council's Housing Fire Safety web pages are currently being redesigned to comply with the requirements and to deal with hard copy requests for information by exception. The final web content proposal was shared with the Tenant Engagement Group on 6 June 2024 to seek their views prior to publication and will include an initial mail shot to all Council Tenants who reside in flats and expected to be completed by the end of July 2024.

- 6.3.23 Housing Managers are working closely with HIWFRS to ensure this aspect and any remaining requirements are met in full. This was discussed with HIWFRS at the Fire Safety Management Steering Group held on 25 September 2023, more recently on 24 January 2024 and HIWFRS are on board with the planned approach. The aim is to complete any outstanding actions by the end of July 2024.

TRAINING

- 6.3.24 The Housing Service has developed a training regime for applicable housing staff, which includes a bespoke fire safety training booklet covering all aspects of fire safety. 9 fire safety training sessions were delivered to 121 staff during July and August 2022, across 5 tailored tiers for specific staff groups with all attendees receiving a copy of the booklet. A further training session took place on 7 March 2023 for specific staff to cover BS 5839: fire detection and alarm systems for buildings. The Council's two Building Safety Officers successfully completed the Association for Specialist Fire Protection (ASFP) Certificate on the Introduction to Passive Fire Protection in early October 2023.

6.4 **GAS SAFETY**

- 6.4.1 The Council is required to carry out an annual gas safety inspection of all 4,583 housing properties which contain a gas burning appliance (Includes 4 properties with LPG). This work is carried out by the Council's Housing Maintenance and Compliance Service using the in-house team of qualified gas engineers.

- 6.4.2 As of 30 June 2024 there are 19 inspections overdue. Of these, 2 are capped, 4 have appointments booked, 8 have been escalated to the Housing Estates team to support engagement with tenants, whilst 5 others have been escalated to legal services to seek an injunction to gain access, whilst engagement continues to seek appointments.

Compliance currently sits at **98.92%**

- 6.4.3 In addition to domestic gas appliances the Council has 27 housing blocks served by communal boiler plant rooms supplying heating and hot water. These systems are maintained by the Council's appointed commercial gas contractor on a rolling inspection regime and includes safety inspection, maintenance and repair.

- 6.4.4 4 of these boiler plant rooms have been replaced in the last 12 months.
Compliance currently sits at **100.00%**

6.5. **LEGIONELLA SAFETY**

- 6.5.1 Statutory legislation requires weekly flushing of outlets in communal bathrooms and kitchens etc., plus temperature checks at nearest, intermediate, and furthest points from feed tanks or calorifiers in 30 housing blocks where communal water tanks or heating cylinders are present. These checks are carried out monthly to ensure compliance.

6.5.2 Additionally, the Council carries out annual risk assessments, including sampling and cleaning of tanks in all 30 housing blocks, and all actions arising from these risk assessments are dealt with as they arise.

6.5.3 The Council's contract with the incumbent service provider, IWS expired on 31 March 2024, with Churchill Services being appointed from 1 April 2024 following competitive tender. In the preceding month of February 2024 compliance sat at 96.23% but fell to 75.5% in March during demobilisation of the incumbent provider. These outstanding inspections were picked up by the Council's new service provider during April and May 2024.

Compliance currently sits at **100%**

6.6 LIFTS AND LIFTING EQUIPMENT

6.6.1 In domestic properties there are currently 144 stairlifts, 21 track hoists, 4 bath lifts, 1 step lift and 8 through floor lifts. In communal areas there are 11 passenger lifts and 8 stairlifts.

6.6.2 In line with statutory requirements, the Council's Lifts and Lifting Equipment Policy sets out the frequency schedule for lift maintenance and safety inspections. Communal passenger lifts are serviced monthly and undergo a detailed inspection every 6 months. Track hoists, through floor, bath and communal stairlifts are serviced and inspected every 6 months, and domestic stairlifts are serviced and inspected annually.

Compliance currently sits at **92.07%**.

6.7 PLAYGROUNDS AND PLAY EQUIPMENT

6.7.1 The Council has 7 playgrounds which are the responsibility of Housing Services. These are subject to weekly routine visual inspections undertaken by the Council's Stock Condition Surveyors, plus quarterly operational inspections and annual detailed inspections carried out by specialist RoSPA trained contractors.

6.8 OTHER COMPLIANCE MEASURES

6.8.1 The Council has several safety systems designed to detect, give early warning and protection in the event of a fire, or give early warning to the presence of carbon monoxide. These consist of:

- Fire Alarms - 33 Blocks
- Automist and fire suppression systems - 2 Blocks
- Automatic opening vents - 8 Blocks
- Firefighting equipment - 22 Blocks
- Smoke detectors – in every property (inspected annually)
- Carbon monoxide detectors – in every room containing a fuel burning appliance, excluding cookers (inspected annually).

6.8.2 These systems are subject to rolling statutory 6 monthly or annual inspection regimes and are complaint, subject to time lag to receipt of certificates.

6.8.3 The Council also has 117 Blocks with emergency lighting which illuminate in the event of a loss of power. These are tested on a monthly rolling basis by an external contractor and are also subject to a full battery drain down on an annual basis.

Compliance currently sits at **92.44%**

- 6.8.4 In addition to the more conventional gas or electric fuelled heating systems the Council has several alternative fuel source heating systems consisting of:
- 107 air source heat pumps,
 - 16 solid fuel boilers,
 - 31 oil fired boilers,
 - 27 heat recovery systems.

All these are subject to annual inspection and servicing by appointed specialist contractor is underway. ASHPs servicing is slightly behind programme, all outstanding services will be complete by September 2024 with access and certification being monitored through our client portal.

Compliance currently sits at **90.88%**

- 6.8.5 The housing stock has 60 automatic opening doors. These range from individual entrance doors to properties for those tenants with disabilities, communal entrance doors to blocks and automatic roller doors to buggy stores. These are tested and inspected 6 monthly.

Compliance currently sits at **98.09%**

- 6.8.6 The Council has 48 Closomat toilets within domestic dwellings for those tenants with disabilities. These are serviced annually with 12 currently awaiting receipt of servicing certification.

Compliance currently sits at **75.00%**

7. REINFORCED AUTOCLAVED AERATED CONCRETE (RAAC)

- 7.1 RAAC is a reinforced form of lightweight concrete used to form panels or planks. It has no aggregate unlike common concrete. These were mainly used in flat roofs but also in some floor and wall panel construction in the UK from the mid-1950s to the mid-1990s. There is evidence that it has been used in a limited number of buildings through the 1990's and 2000's.
- 7.2 RAAC was used in a range of building types, both public and private sector, but is believed to be more common in schools, hospitals and public buildings. It has been discovered in courts, theatres, sports halls, public toilets, and a range of non-domestic buildings. It's use in residential buildings is thought to be limited to roof top plant rooms, and some wall panels.
- 7.3 RAAC has proven to be not as durable as other concrete building materials and has a variable service life influenced by many factors and an arbitrary time, such as the widely reported '30 years' life span, should not be the deciding factor when decision making as it can last longer if the building is well maintained, and the original design factors haven't changed. There is a risk it can fail, particularly if it has been damaged by water ingress from leaking roofs which causes corrosion of the reinforcement, excessive thermal degradation or poor original construction.
- 7.4 Following an initial desk top study of housing blocks with a higher RAAC risk, the Council commissioned the services of AKS Ward who undertook surveys at 13 housing sites in November 2023. RAAC was not identified at any of the properties surveyed, or the wider sites with adjacent blocks of similar construction.

7.5 Whilst the purpose of the survey was for RAAC identification, the appointed Structural Engineer did observe the presence of Woodwool or Stramit roof slabs. No immediate action is required here but has been noted as susceptible to damage and must be assessed prior to any roof access or maintenance activities: -

- Barfield Court, Lymington – communal lounge (Stramit)
- Archgate, Lymington – (Woodwool)

7.6 Woodwool, when used as a roofing product, is not a harmful material, but it can be susceptible to damage during re-roofing works and depending on thickness and span may be considered 'fragile'. Stramit or Strawboards used in flat roof construction is classed as a ruinous material because they lose their structural integrity after becoming wet.

7.7 A health and safety bulletin was issued to all Housing staff and published on the Corporate Health and Safety SharePoint site on 22 April 2024.

8. CRIME AND DISORDER IMPLICATIONS

8.1 It is important for Housing Providers to ensure that statutory safety work is carried out to a high standard. Poorly performing landlords can be fined or prosecuted for failing to take the necessary measures to protect tenants.

9. EQUALITY AND DIVERSITY IMPLICATIONS

9.1 The Council is required to consider what adjustments it can reasonably make when carrying out work within a tenant's home to deal with disabilities or other issues arising. Such adjustments are considered on a case-by-case basis following consultation and assessment with the Council's Housing Occupational Therapist. As an example, fitting an automatic door opening device when fitting a new fire door.

9.2 The design of fire safety systems and evacuation strategies takes into account the vulnerability and disabilities of residents and each building will receive a different a tailored response to its individual circumstances.

9.3 Implications arising from the capping of gas supplies to ensure safety and compliance are addressed separately in the Gas Safety Policy and Report, but which provide a welfare assessment and practical support to tenants affected by such action.

10. ENVIRONMENTAL IMPLICATIONS

10.1 When carrying out works across its stock, the Council looks to use sustainable materials and processes wherever possible.

11. FINANCIAL IMPLICATIONS

11.1 The Housing Revenue Account Budget and Housing Public Sector Capital Expenditure Programme 2024/25 was approved at Council at its meeting on 26 February 2024.

- 11.2 The cyclical maintenance budget includes resources for the mainstream statutory safety requirements, such as gas, electrical, legionella, and lift inspections etc. Funding of £1.886 million was approved for 2024/25 to deal with these matters.
- 11.3 Further fire safety work was identified across all 3 Extra Care buildings in 2023/24 and circa £900,000 was set aside from the approved Capital Fire Safety Expenditure budget. During 2022/23 and 2023/24 the Council will have spent £5 million on fire safety and statutory compliance matters. A further £1 million has been allocated for 2024/25 to deal with the necessary ongoing fire safety measures, including compartmentation and new fire doors following fire risk assessments.

12. CONCLUSION

- 12.1 Compliance with statutory safety requirements is a key priority for Housing Services. In recent years, extra resources have been made available to strengthen the Council's approach to statutory compliance work. This work is firmly embedded within the day-to-day work and culture of the Council's Housing Services.

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Background Papers:

[Housing Revenue Account Budget and Housing Public Sector Capital Expenditure Programme 2024/25](#) - Cabinet
21 February 2024.