

# Brighton & Hove City Council

## Housing & New Homes Committee

## Agenda Item 65

**Subject:** Housing, Health & Safety Update Report.

**Date of meeting:** 13<sup>th</sup> March 2024

**Report of:** Executive Director for Housing, Neighbourhoods & Communities

**Contact Officer:** Name: Martin Reid  
Email: [martin.reid@brighton-hove.gov.uk](mailto:martin.reid@brighton-hove.gov.uk)  
Name: Geof Gage  
Email: [geof.gage@brighton-hove.gov.uk](mailto:geof.gage@brighton-hove.gov.uk)  
Name: Grant Ritchie  
Email: [grant.ritchie@brighton-hove.gov.uk](mailto:grant.ritchie@brighton-hove.gov.uk) Name: [Report

**Ward(s) affected:** All  
**For general release**

### 1. Purpose of the report and policy context

- 1.1 The commitment of the Housing Management Service to the health & safety of our residents and those who visit and work on our homes is our key priority. In light of significant changes in management and maintenance of council housing and in anticipation of legislative and regulatory changes impacting social housing landlords following the Grenfell Tower tragedy, the Housing service have undertaken Housing Health & Safety Compliance Review, reviewing our approach to health & safety compliance and assurance for council homes. This is part of our long-term service improvement plan following the insourcing of the Housing Repairs & Maintenance Service from Mears, during the pandemic in April 2020, and creation of BHCC's dedicated Housing Management Service, fully operational from June 2022.
- 1.2 In line with the Regulator of Social Housing Consumer Regulation Review, in order to ensure that Councillors understand their core landlord responsibilities and accountability and to ensure that there is effective oversight in place of our progress in meeting our health and safety obligations toward tenants and leaseholders, Housing & New Homes Committee have received regular Housing, Health & Safety Update reports. Regular updates have also been provided to our Housing Area Panels, and the Council Tenant Annual Conference. We have also engaged with council tenants through a range of relevant resident engagement groups and included updates in our tenant publication Homing In.
- 1.3 Housing & New Homes Committee on 21<sup>st</sup> June 2023, 20<sup>th</sup> September 2023 and 24<sup>th</sup> January 2024 have considered reports on key outcomes, resourcing, Action Plan and progress arising from the Housing, Health & Safety Compliance Review, undertaken to ensure resources and action in the service are aligned to compliance with new legislation and regulations.

- 1.4 This report provides a further update on progress toward health & safety compliance and on the current engagement between the Housing service and the Regulator of Social Housing (RSH) with whom we have shared information on our backlog of routine repairs and our Housing, Health & Safety Compliance Review. The Regulator is currently considering the council's repairs backlog and landlord health and safety compliance in line with their consumer regulation process. An update on compliance information shared with the Regulator is included in this report.

## **2. Recommendations**

- 2.1 That Committee notes the Housing, Health & Safety Update Report and current engagement with the Regulator of Social Housing.

## **3. Context and background information**

- 3.1 The Council's teams responsible for the management of housing assets have been through a period of significant change over the past three years. Undertaking the Housing Health & Safety Compliance Review was aligned to a number of factors previously shared with Committee. In particular, to enable the service to respond to new duties under building and fire safety regulations and the Social Housing (Regulation) Act, including strengthening of Regulator of Social Housing powers.
- 3.2 The core health & safety compliance areas for review were as follows: asbestos; water safety; fire risk, including fire risk assessments; electrical; gas & fuel safety; and lifts and lifting equipment. The Review also considered overarching areas for compliance and assurance, including: data and ICT systems; policies and procedures; and risk management.
- 3.3 In line with our Housing, Health & Safety Compliance Review our Housing Health & Safety Compliance Governance Board, chaired by Assistant Director, Housing Management, and including senior officers from Housing, Legal and Corporate Health & Safety, meets monthly to oversee and report on progress on compliance priorities arising from the Review.
- 3.4 The Board oversees and reports on progress on meeting Target Completion Dates in our Housing, Health & Safety Action Plan and against wider compliance priorities. This includes oversight of programmes in place to address outstanding remedial actions in a timely manner and all other related matters. This is in order to enable us to provide assurance to all our regulators that we are progressing with reducing health & safety issues and risks promptly to the lowest possible level.
- 3.5 In terms of further oversight, our Executive Leadership Team are kept up to date on Housing Health & Safety compliance issues. In order to ensure effective Councillor oversight, regular updates are also reported to our Housing Area Panels and Housing & New Homes Committee.
- 3.6 We have also incorporated tracking and reporting of progress against actions arising from our wider Housing Health & Safety Review, including

fire safety actions, into our Corporate Strategic Risk SR 32 – ‘Challenges in ensuring robust and effective H&S measures leading to personal injury, prosecution, financial losses or reputational damage’. This Strategic Risk is subject to regular reporting and Committee review.

- 3.7 Our HRA Budget & Capital Investment Programme 2024/25 and Medium Term Financial Strategy, approved by January 2024 Housing & New Homes Committee, reflects the significant legislative and regulatory changes impacting social landlords following the Grenfell Tower tragedy. The HRA budget proposals include significant investment being undertaken in relation to building, health and fire safety compliance and in anticipation of the strengthened role of the Regulator of Social Housing, in particular ensuring adherence to Consumer Standards.
- 3.8 We also continue to invest to strengthen our data, systems and processes in order that we have reliable and robust data sources that clearly show what health & safety testing is being undertaken and what has been completed across the homes we manage. Our Review identified that a key issue impacting upon our health & safety compliance and assurance is that our current Housing ICT systems don't integrate and at present don't fully support these requirements. This provides challenges around gathering, managing, analysing, prioritising and reporting information, risk and actions arising from key data streams.
- 3.9 The Housing service have committed to significant investment in new Housing ICT infrastructure, including moving toward a one-system approach aligning a number of existing data holding systems, including Mears legacy systems, to our core Housing Management system, NECH. This one-system Housing ICT approach to create one dataset within Housing Management meets the golden thread for property datasets. This will result in a single point of storage for and reporting on key health & safety information to ensure properties meet current legislative, compliance, regulatory and corporate standards. We are making good progress on this integration with implementation of the first phase of the NECH Asset Management System anticipated by March 2024.
- 3.10 Pending implementation of the new ICT systems the service continues to verify the data we hold (and in some cases held by our contractors) in order to ensure that it is as comprehensive and accurate as possible, and that it can be analysed and reported upon in a form that supports required measures of assurance, compliance and performance. We anticipate that in some areas of health & safety compliance there is a higher level of certification and assurance than the Council has reported in this report and in our response to the Regulator. However, the service has focused on figures that can be shared with confidence and accuracy with the Regulator of Social Housing.
- 3.11 In addition, and by way of escalation, in order to ensure the health and safety of our tenants, we conduct Equalities Impact Assessments to identify vulnerable residents and discuss the impact to their safety.

### **Regulator of Social Housing**

- 3.12 The Social Housing (Regulation) Act 2023 received Royal Assent on 20 July 2023. There is a focus on a new, improved and more proactive approach towards regulating social housing, ensuring standards are met and action taken against landlords who fail to do so. The purpose of the Act is to *'reform the regulatory regime to drive significant change in landlord behaviour'*. The Act requires the Regulator to publish a plan for the regular inspections of the largest landlords. This will include Brighton & Hove City Council as a landlord with more than 1,000 homes.
- 3.13 In preparation for full implementation of the new regulatory regime for social housing the Regulator of Social Housing have written to all Registered Providers, including BHCC, with the names of their key contacts for regulatory purposes. Providers have been advised that those due for inspection in the first quarter of 2024/25 should also expect to be informed of this shortly. The final versions of the Consumer Standards and Code of Practice were published on 29 February with expanded consumer regulation to commence in April 2024. The Council are currently reviewing these new standards and Code of Practice in order to understand the full implications of these significant regulatory changes and to ensure we have plans for compliance where not already in place.
- 3.14 In anticipation of the forthcoming increase in regulatory powers, the Council continues to engage with the Regulator, responding to their request for further information on the backlog of routine repairs and, as agreed by Housing & New Homes Committee, proactively sharing details of our Housing, Health & Safety Compliance Review and comprehensive information on the latest compliance data and concerns covering the Council's housing stock.
- 3.15 An update on the latest compliance data on the Council's housing stock shared with the Regulator is outlined below.

### **Gas Safety**

- 3.16 *Council properties with a valid Landlord's Gas Safety Record'*; is a Corporate Key Performance Indicator (KPI) measured and reported quarterly to Housing Area Panels and Housing & New Homes Committee members and monthly to our Housing, Health & Safety Compliance Governance Board.
- 3.17 As of 1 February 2024, 99.9% (10,075 of 10,076) of council domestic dwellings with a gas supply had a valid Landlord's Gas Safety Record'. Also, 100% of the 34 council blocks with communal boilers had a valid Landlord's Gas Safety Record'.
- 3.18 We have recently mobilised our new Heating & Hot Water contractor providing this service. Any dwellings out of compliance are closely monitored by our Gas Contracts & Compliance manager. In particular, should any issues arise with no access which we address robustly, albeit with a tailored approach for more vulnerable residents. This includes a process of early engagement where we have had historic access issues.

- 3.19 We currently have 183 tenanted properties which have a capped gas supply. Properties with gas capped-off long-term are predominantly properties where residents choose to not use gas. They are retained on the asset list in order that we continue to track compliance should the gas get reconnected without us being notified. Twelve monthly checks are put in place for any property where gas has been installed, whether capped or not, as a new supply could have been re-provided. An LGSR will be completed if it has.
- 3.20 A referral pathway has been developed for all capped cases, through to offering tenant support. Our contractors notify us each week of any newly capped properties. On notification of a capped supply by our gas contractor, the tenant is contacted by our Housing Customer Service Team to check on their welfare and any fuel poverty or other issues in order that we can understand any vulnerabilities in the household. Should it become apparent that further input would be helpful, the tenant is offered advice and support including with finance and utility charges. This is followed up by a targeted tenancy visit. Any safeguarding issues are also followed up. All cases are kept under review for changes in circumstances.

### **Electrical Safety.**

#### **Domestic testing**

- 3.21 In line with our Housing, Health & Safety Compliance Review we have made significant investment in setting up a dedicated Electrical Testing & Compliance Team consisting of 15 staff with the specific aim of managing a fully cyclical electrical reinspection programme. The aim of the Team is to fully re-test the housing stock, domestic & communal, within 3 years, by December 2026, and then permanently maintain a 5-year testing cycle.
- 3.22 Positive progress continues to be made on electrical safety, including with the procurement and mobilisation of an additional electrical contractor resource to renew recently expired certificates. As of 30th January 2024, a total of 1,740 electrical certificates have been issued by the service across all work programmes since April 2023, as follows: Quarter 1, 404; Quarter 2, 487; Quarter 3, 666; Quarter 4 to date, 183. The service are already ahead of the 1,377 electrical tests undertaken on domestic dwellings during 2022/23 financial year.
- 3.23 In terms of testing cycles and age of certification, the following has been reported to the Regulator: 5 Year EICR domestic testing cycle – 42.9% compliance, 5153 of 12013 assets; 10 Year EICR domestic testing cycle - 66.6% compliance, 8006 of 12,013 assets.
- 3.24 In addition to the figures above 87% (10,493 of 12,013) properties have satisfactory electrical certification issued since our records began in 2007. By way of risk mitigation, the priorities for the domestic electrical testing programme are: **Priority 1**, properties with an unsatisfactory certificate; **Priority 2**, properties with no certification; **Priority 3**, all properties based on age of certification, starting with the oldest first. In undertaking our electrical testing programme, we ensure that all risk actions are remediated and resolved before issuing an electrical safety certificate.

- 3.25 With regard to electrical remedial actions, we have reported 23 overdue actions on EICRs carried out in domestic dwellings. All relate to C2, medium risk, actions. These are the highest priority for the service to remedy and we have been proactively attempting to gain access to the properties to complete necessary works, including taking legal action where necessary. All properties with a C2 action either have a future appointment booked, we are following the formal no access procedure to gain access or Tenancy Services teams are supporting action due to the tenants being vulnerable. The service aims to have completed legal processes for access by July 2024.
- 3.26 In addition, the service have recently started using The Compliance Workbook to analyse electrical certificates. Through this 6970 advisory C3, improvement recommended, actions have been identified and reported to the Regulator. These include retrospectively applied rules to existing certification information following on from updates to the electrical regulations (such as the need for Arc Fault Detection Devices in high rise buildings which would not have previously been considered as a C3). Our intention is to review and address the retrospective application of improvements recommended when the properties in question are due a test on the electrical testing programme.

#### **Communal testing**

- 3.27 As of January 2024, the team have identified 794 communal areas with electrical supplies, of which the service holds satisfactory certification on 220 (28%) buildings issued within 5 years and 526 (66%) buildings issued within 10 years.
- 3.28 To ensure absolute accuracy in reporting compliance, we are currently going through a process of asset reconciliation. Whilst planning the electrical testing programme, inspections were carried out on a cross section of our communal areas as part of a complete review of asset data, including properties with certification. These inspections found that the certification does not necessarily cover all requirements for communal areas, with supplies and boards serving lifts and other servicing areas not always included. In order to establish and ensure full compliance the Electrical Testing & Compliance Team have decided to completely retest all communal areas within the next 3 years, by December 2026, in order to fully cover the whole electrical installation. We have reported to the Regulator that we are we are 5.3%, 42 out of 794 assets, through this programme of retesting.
- 3.29 The retesting of the communal areas has been prioritised as follows:  
**Priority 1** - Communal supplies in high rise blocks. This priority has been assigned due to the number of residents living within the building. The service aims for this to be completed by December 2024. We would expect to complete 25% within the first three months; **Priority 2** – Communal supplies in blocks that are conversions for residential use. This priority has been assigned due to the potential for a lower standard of fire compartmentation between homes. The service aims for this priority to be

completed by December 2024; **Priority 3** - Communal supplies in seniors housing schemes. This priority has been assigned due to the fact that many of the residents may have increased needs and higher levels of mobility issues. The service aims for this priority to be completed by August 2025; **Priority 4** - Communal supplies in larger lower rise blocks. This priority has been assigned due to the fact there are generally more residents living in these blocks compared to the smaller blocks. The service aims for this priority to be completed by June 2026; **Priority 5** - All other communal supplies. The service aims for this priority to be completed by December 2026. As the testing regime gets further underway, we expect the compliance to rapidly improve and have advised that we are content to update the Regulator further at periodic intervals.

### **Fire Safety**

- 3.30 As of our RSH return sent on 1<sup>st</sup> February 2024, we have reported the following compliance to the Regulator: Fire Risk Assessments in high risk buildings, 100% compliance across 65 assets; Fire Risk Assessments in non-high risk buildings, 99.82% compliance, 568 of 569 assets.
- 3.31 The Council carry out Type 1 Fire Risk Assessments (FRA) on a yearly basis on our high-rise properties and our sheltered housing properties, this consists of 65 properties, all others are carried out every 3 years. All FRAs are amended if there are any significant changes to the property or are reviewed after a serious incident. The one outstanding FRA is due to access issues to a leased property, we are actively moving on this through our 'no access' process.
- 3.32 In line with the Council's obligations under the Building Safety Act and Fire Safety (England) Regulations the following compliance and assurance work has been completed by the Council for all our 45 high rise residential blocks:
- 3.33 The Council have undertaken and kept under review analysis of all 45 high rise council blocks utilising the Fire Safety Prioritisation Tool; Block by block action plans for each council high rise residential building have been prepared; East Sussex Fire & Rescue Service (ESFRS) have been supplied with electronic floor plans and building plans via the online portal and information on design and materials in external walls in the form requested; Wayfinding signage has been installed which is visible in low light or smoky conditions so as to identify flat and floor numbers in the stairwells; Relevant fire safety instructions have been provided to high rise residents, including instructions on how to report a fire and any other instruction which sets out what a resident must do once a fire has occurred, based on the evacuation strategy for the building; Checks have been undertaken to ensure that the secure information box for each block contains the documents and information required to be placed in it; Our mobilisation of contractors to undertake more intrusive Type 4 FRAs and to ensure a programme of works is in place to carry out annual checks of flat entrance doors and quarterly checks of all fire doors in common areas is completed.
- 3.34 In addition: The council's programme of flat entrance door upgrades to FD30 (Manse Masterdor replacement) continues to progress. Monthly checks on

essential fire-fighting equipment and taking necessary steps to remedy any issues are underway, with faults to be reported to East Sussex Fire & Rescue Service with whom we maintain close liaison; Procurement & mobilisation of a contractor to enable the Council to ensure an appropriate record is prepared of the design of the external walls of the building, including details of the materials from which the external walls are constructed is complete and the programme of works is underway to complete September 2024; The Council can confirm that all 45 high rise residential council blocks have been registered with the Building Safety Regulator in compliance with the Building Safety Act 2022; Our Large Panel System (LPS) structural investigation survey of 8 HRA blocks are underway to ensure that we have the structural information required for these blocks by the Building Safety Regulator.

- 3.35 Of the 171 fire detection alarm systems we have on our asset list, 91.14% have a fully operational fire detection system installed, the 10 remaining properties (5.85%) have temporary detection fitted while we review a permanent solution for these homes. Testing of communal fire detection alarm systems is conducted quarterly with every detector tested within each 12 month period. We continue to keep common ways clear by removing items daily using appropriate notices. Our Estates Team remove approximately 120 items per week and in addition address around 40 incidences a month requiring removal of items dumped in electrical cupboards. All of our sheltered housing properties have individual Personal Emergency Evacuation Plans for the residents. Residents of our general needs blocks are asked when contacting us, and correspondence has been sent requesting that they inform us, of any health conditions that may require assistance, this information can be supplied to ESFRS on request.
- 3.36 In order to ensure ongoing compliance, we have commissioned a contractor to undertake a full new set of Type 1 FRA's on our 65 high risk buildings to provide a new set of up to date risk assessments for these properties and remediation actions. This programme has commenced with completion due by April 2024. Any new remediation actions arising from these new FRAs will be undertaken and managed within the prescribed timelines. On completion of the programme of new FRAs to our high risk buildings a second phase of new FRAs will be undertaken by our external consultants to our remaining low risk buildings to ensure we have a new and up to date fire risk assessment record for all properties. This programme starts April 2024 and will be complete by October 2024.

#### **Overdue Fire Risk Assessment remedial actions**

- 3.37 In line with our Housing, Health & Safety Compliance Review & Action Plan and creation of the Council's dedicated Housing Management Service a new Building Compliance & Services Team within the new Housing Investment & Asset Management Service has been established. This included creation of a Fire Safety Manager post, later enhanced by agreement to recruit to a Fire Safety Surveyor post. It has taken some time to successfully recruit to these posts. We have recently completed the appointment of our new Fire Safety Manager who joined the Council in November 2023 to undertake the full



management and oversight of all fire safety matters. Recruitment to our Fire Safety Surveyor post is underway.

- 3.38 Our new Fire Safety Manager has reviewed information on and actions arising from mainly historic FRAs, including where we have no record of the action being completed. Following this review we have reported to the Regulator that we have 1748 Overdue Fire Risk Assessment remedial actions. 1713 are categorised as medium risk and 35 as low risk. 1425 actions are over 2 years old. Actions arising from FRAs may range from higher volume works such as remediation or repair works required to meter cupboard or communal doors to more specialist works such as provision of additional ventilation in common areas of blocks. The fire risk remedial actions is a live document which is tracked and reviewed monthly with completed works removed.

#### **Fire Safety risk mitigations**

- 3.39 Our review has indicated that over time, personnel and contractor change and varying methods of recording the remediation actions has contributed to the current number outstanding. The remediation actions highlighted as outstanding are from previous fire risk assessments and actions noted at fire service inspections and have been risk assessed accordingly, we are actively working on these actions to bring them to order as expediently and quickly as possible. We have appointed and mobilised contractors who are now fully engaged on addressing the actions raised. With our contractors mobilised we anticipate completion of current outstanding remediation actions by December 2024, albeit some structural remediation with planning and resident consultation requirements may take longer. Progress will be kept under close review by the Housing, Health & Safety Compliance Governance Board.
- 3.40 To ensure that remedial works are addressed on a risk basis we have reviewed remedial works based on the following priorities: **Priority 1**, Blocks that are conversions for residential use. This priority has been assigned due to the potential for a lower standard of fire compartmentation between homes. This group is also cross-referenced with the smoke detection programme to identify any properties with outstanding FRA actions and no smoke detection; **Priority 2**, High rise residential blocks. Properties in this priority group are further ranked based upon the fire safety risk assessment priority tool. These properties are identified as Priority 2 as they have a stay put policy in place and therefore are reliant on the protection offered by physical fire safety measures; **Priority 3**, seniors housing schemes. This priority has been assigned due to the fact that many of the residents may have increased needs and higher levels of mobility issues and have a stay put policy in place and are therefore reliant upon the protection offered by physical fire safety measures but are not high-rise buildings; **Priority 4**, Lower rise blocks with a large number of outstanding FRA actions. This priority has been assigned as a larger number of FRA actions indicates a lower standard of fire safety; **Priority 5**, all other blocks with any outstanding FRA actions. Each action is categorised based on risk as part of the fire safety risk assessment.

- 3.41 In terms of level of risk, our prioritisation is as follows: High risk = Intolerable; Medium risk = Moderate/ substantial; Low risk = Insignificant/ tolerable.
- 3.42 If an intolerable deficiency is identified it is raised as an urgent 24-hour repair through our in-house repairs and maintenance service. There are no High-Risk actions in the list of outstanding FRA actions.
- 3.43 We have a programme in place and have two specialist contractors engaged in managing all existing and future remediation actions. Work is issued to contractors based on the priority and risk as outlined above. Contractors are instructed to complete highest risk priority remedial actions first and these are tracked through to completion on our Fire Remedial Action Plan. We have allocated a risk against all individual remedial works which is aligned with the Fire Risk Assessment.
- 3.44 Within the overall category of actions, we have set up individual work streams containing particular work types. This enables us to better manage the works and allocate works to the most appropriate contractor. Each work stream will run consecutively. This will be kept under review and the work flows adjusted as required.
- 3.45 We have a work stream for designing and installing improved common way ventilation. Surveying work has commenced in this work stream with a view to setting a programme of works by the end of March 2024. We also have a work stream prioritising outstanding actions in Priority 1 and Priority 2. Work is underway in this work stream with actions being attended to on a risk priority basis. Our contractor reports finding that upon attending some remediation actions the works have already been completed. A third work stream focused on Priorities 3, 4 and 5. Work is also underway in this work stream with actions being attended to on a risk priority basis.

#### **Smoke and Carbon Monoxide Alarms / Detection**

- 3.46 Following our Housing, Health & Safety Review, installation of hard-wired smoke detection and carbon monoxide detection in accordance with the requirements of Smoke and Carbon Monoxide Regulations will be taken forward by the Electrical Testing & Compliance Team. The aim is to take this forward within the same 3 year timescale as the electrical testing programme, by December 2026, with regular review of progress and resources by the Housing, Health & Safety Compliance Board. The Team will be installing AICO smoke / carbon monoxide detection systems. To date, since July 2023, the team have installed gateways and appropriate detection in 629 properties, as of 31<sup>st</sup> January 2024.
- 3.47 With regard to current compliance, as advised in earlier Housing & New Homes Committee reports, information on smoke and carbon monoxide alarms / detection in our homes has not been consistently or well recorded. For the purposes of our regulatory returns we have provided a figure for compliant assets that we have reviewed and can verify to date. We anticipate that many other properties have detection, but those we have been unable to verify at this time are currently excluded from our figures.

### **Carbon Monoxide (CO) Alarms/ Detectors**

- 3.48 Notwithstanding the programme to install hard wired smoke and carbon monoxide detection, our Heating & Hot Water Contractor will continue to install battery powered CO detection in order that we reach compliance as soon as possible. We have reported 71.7% compliance, 7224 out of 10076 assets, to the Regulator in our latest return. We have been liaising with our contractor to increase the pace of installation in order to ensure that all our homes with a gas supply have at least a battery powered carbon monoxide detector by the end of April 2024.

### **Smoke Alarms / Detectors**

- 3.49 The service continues to verify the data we hold (and in some cases held by our contractors) to ensure that it is as comprehensive and as accurate as possible, and that it can be analysed and reported upon in a form that supports required measures of assurance, compliance and performance.
- 3.50 Our Electrical Testing and Compliance Team have carried out further analysis of our smoke detection compliance. They have done this by cross referencing smoke alarm checks which are carried out by our heating & hot water contractors, with information we already hold and have previously reported to the Regulator. This has resulted in our number of properties with known smoke detection increasing to 72.9%, 8762 out of 12,021 assets.
- 3.51 In addition to our planned programme to install hard wired smoke detection previously reported, and to reach compliance as soon as possible, we are commencing a proactive initiative to install smoke detectors in our homes where not already provided. By 29<sup>th</sup> March 2024, we will have written to all tenants living in properties, that according to our records, do not have hard wired smoke detection, requesting them to contact us to arrange an appointment to install detection.
- 3.52 Notwithstanding the programme to install hard wired smoke detection, all operatives within the Housing Repairs & Maintenance team will be issued with battery powered self-adhesive smoke detectors, which they will install if they notice a property they are working on does not have detection. This will be photographed and reported back to the Electrical Testing and Compliance Team. In Quarter 3 (September to December) 2023/24, our Housing Repairs & Maintenance service completed 9,267 emergency and routine repairs, an average of over 3,000 per month, so have access to a significant number of homes in support of this proactive compliance initiative.
- 3.53 We continue to communicate with residents to raise awareness of the importance of smoke detection requesting that tenants contact us if they do not have a smoke detector, including highlighting this proactive work in our next edition of Homing In.

### **Water Safety**

- 3.54 Our water safety contractor undertakes water risk assessments for council housing stock, including properties with water tanks and all seniors housing schemes. Our contractor also undertakes any remedial works required.

Our contractor stores information in relation to their contract with the Council on a proprietary system, which relevant council staff now have access to. All related documents and information are retained on the contractor database and are not currently held in council systems.

3.55 As reported to Housing & New Homes Committee on 21st June 2023, our Housing Health & Safety Compliance Review identified a need to clarify the structure of council assets held on the contractor portal to categories, asset types and responsibilities aligned to management responsibilities. Our Health & Safety Review Action Plan, Key Priority Actions 2023/24 reported to Committee on 20th September 2023, includes a key action in relation to Water Risk Assessment & Site Monitoring, to 'Review assets held in the contractor portal'. This is aligned to enabling development of a suite of Key and Operational Performance metrics to demonstrate the effective management of water safety. Also, to support the Council to design and implement requirements for retaining water safety data and information on council systems.

3.56 We continue to progress this action with our contractor, including provision of an agreed form of monthly reporting of compliance figures, including information on outstanding remedial actions. The information we have from the contractor to date is included in our further compliance response to the Regulator. We have also implemented a plan of action to raise water safety compliance levels across our entire estate.

#### **Water safety in high risk properties**

3.57 The water safety information received from our contractor to date also demonstrates 100% water safety compliance in our 2223 high-risk properties. Our high risk properties include seniors housing schemes and blocks with water tanks for which our contractors undertake monthly inspections on water safety. The breakdown is as follows: seniors housing properties 889; communal areas (resident rooms etc) 17; flats within blocks with communal / stored water 1317. We are undertaking surveys and engagement for blocks with communal / stored water and will be preparing a programme of works to remove these wherever possible and practical during 2024/25 financial year.

#### **Legionella risk assessment**

3.58 Legionella risk assessment information received from the contractor to date includes and shared with the Regulator includes, 7507 of 11959 assets, 62.77% have Legionella risk assessments. This includes 7235 individual dwellings (c 61% of our stock) have been identified in a Risk Assessment as extremely low risk as they are mains-fed with no stored water and are in daily use. These properties are excluded from our testing or flushing activity unless they become void.

3.59 In addition to 7235 individual dwellings under the low-risk property Risk Assessment, 272 individual Water Risk Assessments for our blocks and High Risk Properties have been conducted by our contractor over the last 2 years. Flats within our blocks are subject to a 10% check during the Water Risk Assessment undertaken on the block. As all flats within the blocks all

have similar supplies and set-ups, we consider the 10% representative check under Block's Risk Assessment to represent an implied Risk Assessment for each of the flats within each block. In order to be prudent in reporting compliance, we have included the blocks rather than individual dwellings within these blocks in the figure provided for legionella risk assessments. Given the total number of assets refers to total number of dwellings this is likely to lead to under-reporting of compliance at this time. However, we wish to continue to improve our reporting arrangements with our contractor prior to including a higher compliance figure in our regulatory return.

- 3.60 The remaining 4,452 assets are a mixture of other water systems including:
- 500 properties have Gas appliances that heat individual hot water cylinders within the properties. These are broken down as follows: 464 system or conventional boiler; 14 Back boilers; 14 Warm Air units; and 8 with multi-point water heaters.
  - 2,629 properties have combi boilers, but rather than being stand-alone properties, they are within blocks or converted properties. These properties have no stored hot water, however some will have shared cold water supplies or possibly a down-service feeding the WC cisterns. These are considered low risk.
  - We have 414 Heat Interface Units (HIU's) within our blocks that are supplied by commercial boilers. These HIUs deliver instant hot water to the resident and hence are considered low risk.
  - The majority of the rest of the properties have electrically heated hot water supplies. For example, hot water cylinders with immersion heaters or small single point water heaters. We have been replacing any Fortic-style or side-by-side hot water tanks and are close to completing this project.

#### **Water safety remedial actions**

- 3.61 In our response of 1<sup>st</sup> February 2024, we reported 1384 remedial actions to the Regulator, of which 1090 were overdue with 723 overdue for longer than 3 months. Progress is being made on these actions. We have subsequently been able to report that 723 remedial actions overdue longer than three months notified in the previous report had been reduced to 326 by 21/02/2024. The programme to reduce this further is ongoing and is projected to be completed by the end of March 2024. New actions are being identified as the Planned Preventative Maintenance (PPM) schedule continues, but many of these are being actioned in-day due to new working processes so these new actions figures are low.
- 3.62 Remedial actions are categorised in prioritisation RAG rating: PCAF (Priority Corrective Action Form) 1 month – Urgent; Red 3-4 months, Yellow 6 months; and Green 1 year Rating. However, we are reviewing this prioritisation against current legislation. All PCAF notifications are within target dates for completion and there are none outstanding. In relation to actions categorised as Red, the contractor provides monthly reports. The Council is expecting a further update of those jobs completed, for March 1st.

- 3.63 We are actively working with our contractor to reduce the number of outstanding remedial actions. The contractor has provided additional resources for this and are working toward all outstanding actions being completed by May 2024. Current actions are being undertaken as they arise. We continue to work with our contractor on improving reporting of compliance.

#### **Water Safety Mitigations**

- 3.64 To mitigate the risk to our residents until the full amount of works can be completed, we have undertaken a desktop analysis and risk assessment to identify those properties we perceive as having a potential higher risk and we are targeting those first. In order to do this, we have increased resourcing with the contractor to catch up with the outstanding remedial actions, focusing on the highest risk and most overdue items.
- 3.65 With respect to Water Risk Assessments, we have instructed our contractor to review the water risk assessments across our high-risk properties which includes our 23 Seniors Housing Schemes and 46 High Rise Buildings, to undertake a water risk assessment on any property once it becomes void and subject to a flushing programme and are building a programme to target all other properties starting with those with the highest identified risk. These properties still are only considered medium to low risk, and the Water Risk Assessments for these Medium to Low properties are anticipated to be completed by September 2024, by which time we will have a firmer understanding of where we are and a more robust plan and timeline to complete the rest of the Risk Assessments.
- 3.66 In addition, we have instructed our contractors to complete actions as and when they find them, rather than build a list of future works, as this enables us to deal with items in real time and prevent the actions list increasing.
- 3.67 We have an asset list that we are working through prioritising Seniors Housing Schemes, High Rise blocks and any properties with a water storage tank. We are working to the guidance of the approved code of practice (L8) and the technical guidance (HSG274). We are completing a strategic action plan to ensure we achieve and maintain 100% compliance for water safety. Action planning will be completed by April 2024.
- 3.68 A PCAF notifications log has been requested from the contractor to be sent the last day of each month for review and action by our Housing Investment & Asset Management (HIAM) compliance team. Remedial actions will be issued where appropriate. Those action notifications will be recorded, and a percentage of post-work inspections will be made by the HIAM Compliance Team to ensure for completion and quality.

#### **Asbestos Safety**

- 3.69 As previously reported, there was a delay in the procurement of the current contractor undertaking communal asbestos re-inspections. This delay in procurement and appointment of a successful contractor for our communal

reinspection's had delayed the programme. The contractor is now fully committed on the programme to complete all re-inspections by March 2024. As of 25<sup>th</sup> February 2024, the figure for asbestos re-inspections reported to the Regulator is 514 compliant assets from an asset total of 543, with a compliance rate of 94.7%. The 29 outstanding re-inspections date from 2021.

3.70 The Asbestos reinspection programme is currently on track to be completed by March 2024. The asbestos reinspection programme has recommended 5 remedial actions to date which are currently with our asbestos removal contractor for action. All jobs are within our KPI requirements for completion.

3.71 As an action arising from our Housing, Health & Safety Review, we have appointed an Asbestos Manager who will manage all asbestos activity.

#### **Lift Safety**

3.72 Our compliance update to the Regulator reports 100% compliance on Passenger lifts (LOLER) servicing for 121 assets and 100% compliance on Domestic lift and stair lift servicing for 131 assets.

#### **Damp & Mould.**

3.73 The damp and mould figures provided to the Regulator as of 25 February 2024, 834 open cases, along with an update on progress and two case studies are outlined in Appendix 1. A comprehensive update on the Council's response to Damp and Condensation has previously been provided to Housing & New Homes Committee, including how we prioritise and address cases.

#### **Stock Condition – Meeting the Decent Homes Standard.**

3.74 Our update to the Regulator reports 96.08% compliance with the Decent Homes Standard, 11,359 out of 11,822 assets.

3.75 The Regulator requested information on the latest stock condition survey, including its extent, type of survey, and whether it includes cloned data information. We advised that in anticipation of emerging regulatory guidance, the Council established two surveying posts to support a proactive programme rolling stock condition programme now utilising our 2 full time in-house Stock Condition Surveyors. The surveyors were appointed in October 2023 and, following a period of induction and training, are now undertaking several surveys each day. They survey blocks, tenanted and empty homes. With tenanted homes, we send letters and make appointments as 'cold calling' was not popular with residents.

3.76 The last major 'one-off' stock survey was in late 2019 and was carried out by an independent surveying specialist company. This included surveys of all our blocks and 20% of homes. The results were cloned against archetype and area to be statistically accurate before being added into our asset management database. Reports and results were presented to senior management and details shared with wider teams for programming and budgetary planning. We also added details of kitchen and bathroom

installations from the period of the 'Mears' partnering contract (2010-2020) to the database to add further accuracy.

- 3.77 Delivery of planned works for all areas is ongoing following some initial delays in establishing contracts following the end of the Mears Partnering Contract and the pandemic, five-year programmes are now in place. The five-year programmes include: Kitchen and Bathroom Replacement / Upgrade; Window replacements; Roof replacement; Door replacement (dwellings); External Repairs and Redecorations; Common area Redecorations.
- 3.78 There have been performance issues with kitchens and bathroom contractors, and additional contractor resource has now been appointed, with a view to enhance the programme accordingly during 2024/25.

### **Investigations & Enforcement Action**

- 3.79 In response to a request to provide information on current investigations and enforcement actions being undertaken by third parties into health and safety, we have advised the Regulator of the Fire Service Enforcement Notices previously reported to Committee, served upon the Council in relation to: Saxonbury; Nettleton Court; Clarendon House; Somerset Point; Hereford Court. This information had also been included in previous information shared with the Regulator.
- 3.80 The Regulator has been advised that East Sussex Fire & Rescue Service (ESFRS) are a key stakeholder and regulator, and we work closely with them on all fire safety compliance in our buildings. In common with their approach to various 'Responsible Persons' for all high-rise residential blocks in their area and in order to discharge their regulatory duties, following recent inspections of 5 council high rise blocks, in September 2023 ESFRS served the Council with 5 Enforcement Notices specifying the dates for completion of some aspects of fire safety work, ranging from the end of October 2023 to September 2024.
- 3.81 We have completed a number of the actions specified in the Notices and are continuing to work closely with ESFRS to ensure full assurance and compliance with their requirements as soon as possible. It is a key priority for the Council to rectify areas where we currently don't comply with fire safety regulations. Since receiving the Notices, we have been through our planned fire safety work on our 45 high-rise blocks and reprioritised the actions needed. This includes bringing forward some of the work that we have previously planned that requires specialist contractors in order that we can address all outstanding issues on the fastest timescales possible.
- 3.82 Enforcement Notice actions are being progressed. Progress is being monitored against a fire safety action plan and overseen by the Housing, Health & Safety Compliance Board. Weekly meetings are held with between the Council and East Sussex Fire & Rescue with progress and escalation discussed and actioned.
- 3.83 The Council has subsequently awarded a number of surveying contracts to address the initial requirements of these notices alongside provision to



undertake the required surveys on all of the councils' relevant properties. Given the Enforcement Notices and other legal requirements the remedial works and / or more extensive surveys that will arise as initial surveys are completed and will urgently require the Council to complete works. The current volatility of the construction market alongside high demand for specialist fire safety remedials means that the more flexibility the council has to award contracts quickly will improve how quickly remedial works can be completed.

- 3.84 In light of this, Housing & New Homes Committee (15th November 2023) have delegated authority to our Executive Director to of Housing, Neighbourhoods & Communities to procure and award contracts for works and services related to Building Safety Act and relevant fire safety regulations, including Fire Safety (England) Regulations 2022.
- 3.85 The Council have written to all residents in the 5 blocks subject to enforcement notices to share the detail of the fire safety work we will be carrying out in those blocks. Our letter set out how to contact the Housing service if residents have any follow up questions or concerns. We also held drop-in sessions for residents.
- 3.86 Housing Health & Safety Compliance Governance Board, which meets monthly to oversee and report on progress on actions and compliance arising from our Housing Health & Safety Review, will also monitor actions arising from our action plans concerning Fire Safety in High Rise Council Residential Buildings.

#### **4. Analysis and consideration of alternative options**

- 4.1 The Housing Health & Safety Review and engagement with the RSH has been taken forward in anticipation of and in order to ensure that we are prepared for and compliant with recent and forthcoming legislative and regulatory changes impacting social housing landlords following the Grenfell Tower tragedy.
- 4.2 Progress against actions arising from the Review and any changes to the Action Plan, including those arising following completion of current Government and RSH consultation, will be overseen by the officer Housing Health & Safety Compliance Governance Board. Further updates will be brought back to Housing & New Homes Committee for consideration as required.

#### **5. Community engagement and consultation**

- 5.1 Engagement with our tenants and residents is essential to enable the Housing service to progress key elements of the Review. This will include residents being engaged within our Fire Risk Assessment process, incorporating sharing information on fire safety assessments in high-rise blocks, and also communication with tenants and residents to enable access to homes for essential inspections.

- 5.2 Resident engagement has and will continue to be taken forward via established communication routes such as Homing In and resident consultation meetings. This includes Housing Area Panels, Council Tenant Annual Conference, Home Group, Involvement & Empowerment Service Improvement Group and Tenant Disability Network. We will also reach out to residents and communities as part of our wider proposals to expand resident engagement.
- 5.3 Housing Health & Safety Update and RSH Consumer Standards presentations were shared with September Housing Area Panels as well as Housing & New Homes Committee. We have recently received the outcome of the RSH Consumer Standard consultation and are currently reviewing the implications and next steps.
- 5.4 East Sussex Fire & Rescue Service are a key stakeholder and regulator with whom we continue to work closely on legislative and regulatory matters.

## **6. Conclusion**

- 6.1 Housing & New Homes Committee members are asked to note the Housing Health & Safety update and current engagement with the Regulator of Social Housing and that further updates will be brought back to Committee following the outcome of the RSH consideration of the council's compliance with their current consumer regulation process.
- 6.2 This review into our approach to Housing health & safety compliance and assurance in council homes has been undertaken in anticipation of a new legislative and regulatory framework for social housing arising from the Social Housing (Regulation) Act becoming law in Spring 2024.

## **7. Financial implications**

- 7.1 The recommendation of this report does not have any direct financial implications for the HRA.
- 7.2 The 24<sup>th</sup> of January 2024 Housing & New Homes Committee and 22<sup>nd</sup> February Full Council approved the 2024/25 HRA budget paper. This paper included the budget provisions for the financial year 2024/25 and the five year Medium Term Financial Strategy (MTFS).
- 7.3 Investment in the Health & Safety works for 2024/25 totals £14.985m, split £2.689m and £12.296m between Revenue and Capital respectively. The revenue budget is a recurring provision over the five year MTFS for the HRA accounting for the team resources required to undertake the work outlined in the report.
- 7.4 The Capital investment over the five year period totals £50.969m, tis budget line will support the delivery of works required, this could be through the use of procured contractors or in house teams set up specifically to deal with the Health & Safety programme of works.

- 7.5 All budget lines have been estimated based upon the current programme of works and delivery outlined in the report, they will be kept under review through the councils monthly financial management procedure, referred to as Targeted Budget Management (TBM). In addition to this a finance update is provided to the Health & Safety Board on a monthly basis setting out the forecast for the year and highlighting any pressure points that need addressing.
- 7.6 As a result of the Social Housing (Regulation) Act 2023 receiving Royal Assent on 20<sup>th</sup> July 2023, there is a cost implication arising from a new fee being introduced for all Registered Providers. This fee is estimated to be £0.065m, the 2024/25 HRA budget includes a service pressure of £0.100m to manage this cost.

Name of finance officer consulted: Craig Garoghan      Date consulted :  
28/02/2024

## **8. Legal implications**

- 8.1 The legal implications paragraphs in earlier update reports highlighted the risk of enforcement action by the RSH and the risk of legal action by tenants and leaseholders. Whilst progress is being made to address various deficiencies, those risks remain.

Name of lawyer consulted: Liz Woodley      Date consulted 28/02/24:

## **9. Equalities implications**

- 9.1 The HRA budget funds services for people with a range of needs, including those related to age, vulnerability or health. All capital programme projects undertaken include full consideration of various equality issues and specifically the implications of the Equality Act. To ensure that the equality impact of proposals included in this report are fully considered, equality impact assessments will be developed on specific areas as required.
- 9.2 In terms of engagement with our residents. It is clear from the current equality monitoring of participation, that there is under representation from minoritised communities. The Housing service continue to work with Community Engagement Team colleagues on proactively seeking the voice of under-represented groups in line with the Public Sector Equality Duties placed on the council to advance the equality of opportunity, to foster good relations and eliminate discrimination for marginalised communities.

## **10. Sustainability implications**

- 10.1 Helping residents to live in well-insulated, efficiently heated, healthy homes addressing fuel poverty issues remains a key long-term objective, which is supported through the work of our Housing health & Safety Review.

## **Supporting Documentation**

## **1. Appendices**

1. Appendix 1 – Damp & Condensation update, response to the Regulator of Social Housing, 25<sup>th</sup> February 2024.

## **2. Background documents**

1. Housing & New Homes Committee, 24<sup>th</sup> January 2024, Agenda Item 50. Housing Revenue Account Budget & Capital Investment Programme 2024/25 and Medium Term Financial Strategy.
2. Housing & New Homes Committee, 24<sup>th</sup> January 2024. Agenda Item 51. Housing, Health & Safety Update Report.
3. Housing & New Homes Committee, 20<sup>th</sup> September 2023. Agenda Item 24 – Housing, Health & Safety Update, Report and Action Plan.
4. Housing & New Homes Committee, 21<sup>st</sup> June 2023. Agenda Item 10 – Housing, Health & Safety Update.
5. Housing Health & Safety Compliance Review, Brighton & Hove City Council, Ridge, March 2023.

### **Appendix 1 – Damp & Condensation update, response to the Regulator of Social Housing, 25<sup>th</sup> February 2024**

An update on progress with our response to damp and mould cases and the breakdown requested is below. We have also added some case studies by way of illustration of our prioritisation and approach.

We have increased engagement of contractors to carry out washdowns since December 2024, currently at 6 contractors plus the Housing Repairs & Maintenance Service teams and operatives, has enabled us to reduce numbers of outstanding damp and mould jobs since last report to the Regulator. This has decreased from 949 jobs reported on 31<sup>st</sup> January 2024 to 834 jobs as of 22<sup>nd</sup> February 2024.

During the last 6 months (20/8/23 - 20/2/24) the service has processed the following numbers of jobs:

- 1,581 tasks raised across all stock types and priorities in relation to Damp, Mould and Condensation.
- 1,014 tasks completed across all stock types and priorities in relation to Damp, Mould and Condensation.
- Current Work in Progress (WIP) of 951 tasks raised across all stock types and priorities in relation to Damp, Mould and Condensation.

Seasonality of damp and mould issues with lower temperatures and poor weather dictates that the majority of this work has been undertaken over the last 4 months since November 2023. The service has seen a high number of reports of damp and mould, predominantly reported via telephone or email. At initial triage stage it is determined whether there are vulnerable tenants at risk, for example if there is mention of respiratory ill health or particularly young or elderly tenants affect. Any cases flagged as priority are picked up by the Damp Team and emailed to the Project Manager who can make arrangements for quick response appointments to assess the situation and wash down amongst other remedial actions.

**The number of current open damp and mould cases. (as of 22/2/24)**

The total number of individual tasks (Work in Progress – WIP) associated to damp and mould cases open currently is 951. This is split across 905 unique addresses. Of these open cases 834 tasks are related to permanent council homes, split across 790 unique addresses.

The type of works can broadly be split down into 6 categories, see below, figures are included for permanent council homes only:

**Housing Repairs & Maintenance service damp washdown jobs**– currently sitting at 242 tasks (29%), raised across 241 unique addresses. (please note that this is the first place a new damp job is raised – a number of these jobs will likely be assigned to contractors when they are reviewed).

**Contractor washdown jobs** - currently sitting at 452 tasks (54%), raised across 448 unique addresses.

**Housing Repairs & Maintenance service damp remedial works** – currently sitting at 103 tasks (12%), raised across 103 unique addresses. 43 of these jobs are raised against the electrical team to install extractor fans.

**Contractor cavity wall insulation (CWI) & associated works** – as at 22/02/24, sitting at 11 tasks (1.5%) these are raised across 11 unique addresses.

**Contractor damp remedial works** – as at 22/02/24, sitting at 9 tasks (1.5%), these are raised across 8 unique addresses.

**Specialist external surveyor works** – as at 22/02/22, sitting at 17 tasks (2%), these are raised across 17 unique addresses.

Our systems currently offer 3 priority codes that can be issued to damp and mould jobs raised and the profile of 834 tasks reported above is as follows:

- 24hrs – 0 tasks
- 28 days – 669 tasks (80%)
- 365 days – 165 tasks (20%)

**28 day priority** is currently used for initial attendance and washdown tasks. If a case is reported that is highlighted as significant or involves young or vulnerable residents, this will be emailed directly to the Damp Team and project manager for urgent attendance. The tenants will be contacted by the Damp Team and earliest convenient appointment raised for project manager or supervisor to visit the property and risk assess the situation before ordering remedial works. Actions taken from the visit could include but are not limited to:

- Expedited works order to wash down and redecorate areas of damp and mould.
- Ordering of professional survey to highlight causes of damp and mould and recommend remedial works.
- Ordering of remedial works to resolve any water penetration or building defects.
- Ordering installation or replacement of ventilation systems.

- Hiring of plant such as dehumidifiers and/or air scrubbers to improve the situation in the property as a mitigation until such time as remedial works can be completed.
- Recommendation to decant tenants until such a time as remedial works can be completed.
- Installation of environmental sensors and SmartHub enabling remote monitoring of conditions within the property by the Council.
- Advising tenant on issues and educating on causes of damp/condensation and mould and how to prevent this in conjunction with repairs.

**365\_day priority** is used for building improvement works that may be on a longer lead-in time such as significant damp-proofing work, installation of CWI etc. The service is currently working on changes to IT systems to reflect the priorities and timeframes identified in the consultation for Awaab's Law.

### **Damp & Mould Case Study 1 – 2 Bed Ground Floor Flat**

On 15<sup>th</sup> January 2024, we received a report of damp and mould at a property. The tenant was telephoned the next day, and a mutually convenient inspection was booked for 23<sup>rd</sup> January. On attendance, the Project Manager who visited diagnosed a significant condensation issue with a baby in the property. Aico environmental sensors were installed with a Smart Hub, enabling us to monitor conditions remotely. This told us that although an adequate heating system was installed, this was not being used effectively. The tenants were instructed on the effective use of the heating system and funds made available as a temporary measure to enable them to carry this out. Tenants were also advised against drying clothes on radiators in rooms which couldn't be adequately ventilated, and they followed this through. An urgent washdown and redecoration was ordered along with a survey for installation of bathroom and kitchen extractor fans. Between 26<sup>th</sup>-30<sup>th</sup> January, the mould was washed down and treated, and redecoration completed by a contractor, the tenants were very grateful for both repairs intervention and advice offered which has greatly improved their living conditions.

### **Damp and Mould Case Study 2 – 2 Bed Ground Floor Flat**

A case was passed to the service on 29<sup>th</sup> January 2024 through a caseworker from a local advocacy group. It was reported that damp and mould were affecting a family in a flat including a pregnant woman and three children with one child suffering asthma. The tenants were contacted on 30<sup>th</sup> January and booked in for a visit that afternoon. The Project Manager who visited identified significant mould caused by condensation along with additional repairs. Both plastering and plumbing teams also attended that day to address repairs, asbestos removal works were ordered and bathroom taps replaced. The Project Manager who visited also arranged for an expedited washdown to be carried out, starting on 2<sup>nd</sup> February and arranged a survey for ventilation installation. The Project Manager visited again on 31<sup>st</sup> January to advise of actions taken and ensure tenants were ready for washdown works to commence later that week. The Project Manager met the contractor on site on 2<sup>nd</sup> February to instruct and works commenced washing down and redecorating affected areas. This work was completed on 7<sup>th</sup> February 2024.



