

Housing Compliance Action Plan

(Completion of all actions will take us to a BAU state)

Ref	Action Source	Code	Action	Lead	Due Date
CAP4	Risk - IT	C2	CADI project implementing keystone modules fully operational	Garry Knights	Mar 2021
			<i>Comments</i>		
			Successfully move from the current use of individual spreadsheets to a fully integrated system		
			Delays to project (Data matching, Procurement and IT processes)		
			<i>Milestones</i>		<i>Progress</i>
			Full keystone system review undertaken	John Mitchell	Sep 2020
			To-be processed mapped and ready	John Sanders	Oct 2020
			System design work and data update	John Mitchell	Sept 2021
			Go live for Gas and Electric workstream	John Mitchell	Dec 2021
			Design work for all other workstreams	John Mitchell	September 2022
CAP8	Risk – Staff/team	C3	Training programme to be developed for growing our own compliance officers	Garry Knights	Mar 2021
			<i>Comments</i>		
			Training identified in policies and will work with Occupational Development and apprenticeship team		
			<i>Milestones</i>		<i>Progress</i>
			All staff trained following reorganisation		September 2022
CAP9	Risk – Staff/team	C3	Develop additional team capacity, take through relevant governance and recruit	Complete	
			<i>Comments</i>		
			Will begin recruitment in October.		
			<i>Milestones</i>		

			New reorganisation underway to include all of Property Services		
			Permanent recruitment to be completed		
CAP12	Risk – Fire Safety	C5	Long terms works programmes to deliver FRA works to be developed and procured	Garry Knights	Nov 2021
	Risk – Compliance Management	C6	<i>Comments</i>		
			14 individual packages identified		
			Delays to procurement due to the removal of consultant. New consultant being sought via Bloom		
			Looking to extend contracts for a further year		
			<i>Milestones</i>		<i>Progress</i>
			Appoint consultant to support	Garry Knights	Aug 2020
			Scope and strategy to be agreed	Garry Knights	Nov 2020
			All packages procured, all contracts to be in place to replace existing arrangement mobilised by April 2022	Garry Knights	April 2023
CAP101	Building Safety Bill		Building Safety Manager		
			Develop new role and undertake pay evaluation	<i>June 2022</i>	
			Recruit 3 based on 13 buildings	<i>June 2022</i>	
			Establish resident engagement strategy for BSM (Building Safety Manager)	<i>Post recruitment</i>	
			Establish strategy for managing each property	<i>Post recruitment</i>	
			Establish approval processes for works etc	<i>Post recruitment</i>	
			Establish reporting protocols	<i>Post recruitment</i>	
			Establish right of entry protocols and publish	<i>Post recruitment</i>	
			NO LONGER A REQUIRMENT OF THE BILL		
CAP102	Building Safety Bill		Resident Safety and Compliance Policies		
			Review polices to ensure compliance with new bill	<i>Resident Safety Manager</i>	<i>Sep 2022</i>
			Undertake Independent review of policies	<i>Savills</i>	<i>Nov 2022</i>
CAP103	Building Safety Bill		Products		

			Establish a Havering product standard (involve long term partnering contractors)	<i>All PS managers</i>	<i>Oct 2022</i>
			Develop a review panel and process		<i>Oct 2022</i>
CAP104	Building Safety Bill		IT		
			Determine if current systems are fit for purpose to deliver the full golden thread required (keystone, Open Housing – given the level of asset data which will be required and updating required at granular level)	<i>GK/JS/JM/DC</i>	<i>Oct 2022</i>
			Identify and procure alternative solutions where required	<i>DC</i>	<i>TBA</i>
CAP105	Building Safety Bill		Regulator		
			Establish links with regulator	<i>GK</i>	<i>As per the Act</i>
			Register all relevant existing buildings as per the act and apply for relevant certificate	<i>TBA</i>	<i>TBA</i>
			Ensure Mandatory Occurrence Reporting system is in place	<i>TBA</i>	<i>TBA</i>
			Establish process for Accountable person to demonstrate compliance with duties	<i>TBA</i>	<i>TBA</i>
			Agree reporting processes for building failures (what is considered a failure)	<i>TBA</i>	<i>TBA</i>
CAP106	Building Safety Bill		Regeneration (this is only the actions required as a the freeholder/landlord/accountable person not as developer)		
			Develop a clear client role with the regeneration team in regards to building safety	<i>GK/ Resident Safety Manager</i>	<i>Sep 2022</i>
			Agree full handover processes including all relevant documentation in format which support golden thread/building safety case file	<i>JS</i>	<i>Oct 2022</i>
			Registration of new building with BSR (Building Safety Regulator)	<i>GK/Resident Safety Manager</i>	<i>Oct 2022 for NNP (Napier and New Plymouth)</i>
			Obtain building Assessment Certificate	<i>GK/Resident Safety Manager</i>	<i>Nov/Dec 2022 for NNP</i>
CAP107	Building Safety Bill		Building Safety Case File		

			Determine appropriate content (liaise with regulator, best practice groups)	<i>GK/JM/JS/CS/BSMs</i>	<i>Highfield towers pilot</i>
			Establish how and where published	<i>GK/BSM</i>	<i>TBA</i>
			Establish updating process	<i>GK/BSM</i>	<i>TBA</i>
			Establish ownership and control process (BSM)	<i>GK/BSM</i>	<i>TBA</i>
			Establish information publication approaches (twinnedit and website)	<i>GK/BSM</i>	<i>TBA</i>
			Establish Asset tagging/identification approach	<i>GK/BSM</i>	<i>TBA</i>
CAP108	Building Safety Bill		Costs		
			Determine service charge approach for new regimes	<i>GK/EH</i>	<i>Mar 2023</i>
CAP109	RFFO		Door Checking Regime		
			Establish new door checking regime, who, how often etc	<i>JS</i>	<i>October 2022</i>
CAP110	Building Safety Bill and RFFO		Leaseholder Issues		
			Access Protocols	<i>EH/Legal</i>	<i>Dec 2022</i>
			Enforcement	<i>EH/Legal</i>	<i>Dec 2022</i>
			Lease changes??	<i>EH/Legal</i>	<i>Dec 2022</i>
CAP111	Building Safety Bill and RFFO		Education for all Staff		
			Training session for all housing staff on responsibilities	<i>Resident Safety Manager</i>	<i>Oct 2022</i>
			Clear protocols on how to report issues	<i>GK/EH</i>	<i>Oct 2022</i>
CAP112	Building Safety Bill		Enforcement		
			Issuing Contravention notices from Accountable Person (how and when)	<i>Resident Safety Manager/GK</i>	<i>Dec 2022</i>
CAP113	Mazars	5.1.1	Ensure operational procedures for all compliance areas are written down and understood by team	<i>Resident safety and Compliance Manager</i>	<i>Oct 2022</i>

			Gas		
			Electrical		
			Lifts		
			Legionella		
			Asbestos		
			Fire safety		
CAP113	Mazars	5.1.2	Ensure overdue remedial actions are included in performance reporting	<i>completed</i>	
CAP114	Mazars	5.3	Data integrity		
		5.3.1	Accuracy of programme data	<i>Completed</i>	
			Open housing and keystone interface fully operational so all properties reconciled		
			Data tested and checked regularly, EICR and gas data on keystone with automatic updates		
CAP115	Mazars	5.4.1	Adding properties to the gas register	<i>Complete</i>	
		5.4.2	Disposing of properties and removing from the list	<i>Complete</i>	
			Open housing and keystone interface fully operational so all properties reconciled		
			We now provide weekly property lists for servicing to K&T so properties will no longer be missed (previously K&T worked off an annual lists with ad hoc amendments)		
CAP116	Mazars	5.4.3	Post inspection	<i>Complete</i>	
		5.4.4	Monitoring of post inspections		

			New surveyor is in the repairs teams who will be undertaking post inspections and review PCM work		
CAP117	Mazars	5.5.1	Overdue FRAs	<i>Complete</i>	
			All FRAs are complete and no in the reassessment cycle		
CAP118	Mazars	5.5.2	Missing FRA remedial actions from tracker	<i>Complete</i>	
		5.5.3	Completion of FRA actions	<i>Complete</i>	
			Full FRA team in place and all actions being entered onto system and monitored, where they cannot be completed before due date this is noted on compliance performance reports		
CAP119	Mazars	5.5.4	Contract Management – regular progress meeting with contractors	<i>Complete</i>	
			Regular meeting in place with all compliance contractors		
CAP120	Mazars	5.6.1	Updating the asbestos register	<i>Complete</i>	
			Asbestos team manage all asbestos surveys and ensure they are on the system, they are working across teams to ensure all source are covered		