

# UDC compliance assurance requirements from UNSL for critical health and safety factors

## Introduction

Following the paper issued to UNSL by Roger Harborough on the 19<sup>th</sup> November 2021, and then discussed as part of the Company Board meeting of the same date, UNSL continued with its review of all compliance areas as part of the transition exercise of moving the compliance data from its current method of data capture and certificate storage to a set of new compliance portals. This was going to be a mix of SIMPRO, Piranha or TEAMS, with a deadline of having the portals all live by the 31<sup>st</sup> March 2022, however following early issues with uploading the data and then checking the functionality of the portals to deliver the outcomes required as part of the paper issued by UDC, UNSL took the decision to look at alternative solutions, this resulted in the Connect Compliance portal being the preferred option. Advantages of using Connect include all compliance information on one portal, KPI dashboards for each area of compliance, the ability to look forward to replacement requirements, therefore assisting in long term budget planning. Although UNSL has changed the portal it is going to utilize for the management of compliance. The go live date remains the same

Having reviewed the paper issued by UDC, UNSL has looked at all the bullet points on each area of compliance and responded with how this is going to be achieved:

### Gas:

- The denominator – namely exactly how many properties have gas, and therefore require an annual inspection: – ***The number of properties that have a requirement for an annual gas inspection under the Gas Safe Legislation will be recorded on the Connect Compliance Portal. A full list of those same properties will be available to be downloaded if required and this number will also be detailed on the monthly compliance spreadsheet.***
- The numerator – namely exactly how many properties with gas that have been inspected: – ***The number of properties that have had the annual gas inspection will be recorded on the Connect Compliance Portal. The Gas Certificate will be uploaded to the portal for future reference and for statutory reporting requirements. The total number of properties that have a current Gas Certificate will also be detailed on the monthly compliance spreadsheet.***
- For any of those properties inspected and found to have any defect, we require adequate details for each specific named property (as specified above) – ***Any defect found either as part of the annual appliance planned preventative maintenance servicing routine or during the annual gas safety check will if possible be fixed at the time of the visit. If a repair cannot be undertaken, then the property is provided with alternative heating options and the hot water immersion cylinder is checked and left working. A report is then issued detailing the works required by UNSL's sub-contractor and a decision is made on the best solution to rectify the issue. This is business as usual under the contract and not currently reported to UDC unless the rectification period is going to take an unreasonable time. Going forward if required this requirement can be added to the Weekly Gas Servicing report sent to UDC.***

- Details of properties 'Disc-ed' – ***The details of any property which has been Disc-ed is reported to UDC on the Weekly Gas Servicing Report / Dodd Service Program weekly report.***
- Where the proportion of those inspected compared to those that need an inspection is not 100%, we further require both the number of properties that have not been inspected and a detailed list of those specific properties, as well as a treatment strategy, with dates, detailing the action being taken by UNSL as agreed in the SLA: – ***Any property which needs an inspection however, has not received an inspection for whatever reason is captured on the Weekly Gas Servicing Report. This report details the reason why an inspection has not been carried out and the status of the actions being undertaken by UNSL to gain access to complete the inspection.***
- We need to be notified on properties where no carbon monoxide monitor has been recorded: – ***The carbon monoxide monitor is checked as part of the annual Gas safety check with the result recorded on the Gas Certificate. If a battery powered Monitor is not working when tested, the battery is replaced and if required a new Monitor installed. Where a mains carbon monoxide monitor is found to be defected, this is reported by Dodd to UNSL, and treated as an emergency however, as an interim measure a battery carbon monoxide monitor is fitted until a replacement mains monitor is installed. Currently all properties which have a gas appliance have a Carbon Monoxide Monitor fitted. In the exceptional event that this changes UDC will be notified on the Weekly Gas Servicing Report and the monthly compliance report. This will include details of when the property will receive a monitor, and the reason why no monitor is fitted.***
- The reporting mechanism needs to migrate from a locally managed excel spreadsheet to the online SIMPRO or Piranha by 31 March 2022. A decision on which portal is to be made by 31 November 2021: - ***The Connect Portal will be used for management of Gas compliance. It will be live by the 31<sup>st</sup> March 2022.***

## **Legionella**

- The denominator – namely exactly how many properties have shared water tanks, and therefore require monthly inspection: ***The number of properties that have a requirement for monthly water monitoring under L8 Legionnaires Disease legislation will be recorded on the Connect Compliance Portal. A full list of those same properties will be available to be downloaded if required and this number will also be detailed on the monthly compliance spreadsheet.***
- The inspection rate – namely exactly how many properties have been inspected, and a percentage thereof against the denominator: - ***The number of properties that have been subjected to monthly monitoring / sampling / flushing will be recorded on the Connect Compliance Portal. This will be shown as a percentage against the Denominator and will also be detailed on the monthly compliance spreadsheet as both a numerator and a percentage.***

- The success rate – namely how many properties have fully passed the monthly inspection, and a percentage thereof against the denominator. - ***The number of properties that have fully passed the monthly monitoring / sampling / flushing will be recorded on the Connect Compliance Portal. This will be shown as a percentage against the Denominator and will also be detailed on the monthly compliance spreadsheet as both a numerator and a percentage.***
- Itemised updates on each individual property that either failed the test the previous month or was not tested because of lack of access – ***Currently any property which fails any element of the monthly monitoring checks is dealt with as business as usual by UNSL. No access is not an issue as all properties under the testing regime are communal buildings and any property which has failed monitoring checks is highlighted on the monthly compliance spreadsheet. This details the reason why any element of the monitoring routine has not been carried out and the status of the actions being undertaken by UNSL in order to gain access to complete the inspection.***
- We would expect the Teams portal to be populated by 31 December 2021, including any back log of reports since [1 April 2020] not yet uploaded: - ***The Connect Portal will be used for management of Legionella. It will be live by the 31<sup>st</sup> March 2022.***

#### **Fire Risk Assessments and Cladding Issues**

- The denominator – namely exactly how many properties have a requirement for a Fire Risk Assessment, and therefore require an inspection: ***The number of properties that have a requirement for Fire Risk Assessment under current legislation will be recorded on the Connect Compliance Portal. A full list of those same properties will be available to be downloaded if required and this number will also be detailed on the monthly compliance spreadsheet.***
- The inspection rate – namely exactly how many properties have been inspected, and a percentage thereof against the denominator: - ***The number of properties that have been subjected to a Fire Risk Assessment will be recorded on the Connect Compliance Portal and will be shown as a percentage against the Denominator. This will also be detailed on the monthly compliance spreadsheet as both a numerator and a percentage.***
- The success rate – namely how many properties have fully passed the inspection, and a percentage thereof against the denominator: - ***The number of properties that have fully passed the Fire Risk Assessment will be recorded on the Connect Compliance Portal and will be shown as a percentage against the Denominator. This will also be detailed on the monthly compliance spreadsheet as both a numerator and a percentage.***
- For any of those properties inspected and found to have any defect, we require adequate details for each specific named property (as specified above): – ***Any property in which the Fire Risk Assessment highlight defects will be reported on the monthly Compliance Spreadsheet. Any defect will be actioned or passed to the relevant person within UDC for***

*action [An example is poor housekeeping with tenant's old items dumped in communal areas causing access issues] on receipt of the FRA.*

- For any properties that were not inspected but are not out of the 12-month inspection window, we expect confirmation that each is programmed in for the following month: – ***The Connect Compliance Portal has a front page for each compliance discipline. This has a next month, two month and annual inspection key and allows UNSL to adequately plan future Fire Risk Assessments throughout the year. Future functionality will allow orders to be directly placed with nominated specialists directly by the system.***
- For any properties that were not inspected and are now outside the 12-month inspection window, we expect full details of the action being taken to secure prompt access: - ***All properties requiring Fire Risk Assessment are communal or corporate. Therefore, access is not an issue. In the event that a Fire Risk Assessment is not undertaken with the 12-month inspection window, this will be reported on the monthly compliance spreadsheet and will detail the reason why Fire Risk Assessment have not been carried out and the status of the actions being undertaken by UNSL in order to complete the same.***
- We would expect the SIMPRO portal to be populated by 31 December 2021, including any back log of reports since [1 April 2020] not yet uploaded: - ***The Connect Portal will be used for management of the Fire Risk Assessments. It will be live by the 31<sup>st</sup> March 2022.***

## **Electrical Inspections**

- The denominator – namely exactly how many properties are in scope [i.e. all, as all have electricity], and therefore require a five yearly inspection: - ***The number of properties that have a requirement for an Electrical Installation Condition Report that are undertaken to the applicable IET Wiring Regulations applicable at the time of build, will be recorded on the Connect Compliance Portal. A full list of those same properties will be available to be downloaded if required. This number will also be detailed on the monthly compliance spreadsheet.***
- The inspection rate – namely exactly how many properties that have been inspected: - ***The number of properties that have been subjected to an Electrical Installation Condition Report will be recorded on the Connect Compliance Portal. This will be shown as a percentage against the Denominator and will also be detailed on the monthly compliance spreadsheet as both a numerator and a percentage.***
- For any of those properties inspected and found to have any defect, we require adequate details for each specific named property of both fault and remediation plan: – ***If during the Electrical Installation Condition survey, a property is found to have defects classified as C1 or C2 under the applicable IET Wiring Regulations, these would be repaired at the time of the inspection, where possible. If this is not possible, they are completed the next working day.***

- For any properties that were not inspected but are not out of the 5-year inspection window, we expect confirmation that each is programmed in for the following month: – ***The Connect Compliance Portal has a front page for each compliance discipline and has a next month, two month and annual inspection key. This allows UNSL to adequately plan future Electrical Installation Condition Report surveys throughout the year. Future functionality will allow orders to be directly placed with nominated specialist directly by the system.***
- For any properties that were not inspected and are now outside the 5-year inspection window, we expect full details of the action being taken to secure prompt access: - ***In the event that a Electrical Installation Condition Report test is not undertaken and therefore the property no longer has a certificate that is dated within the previous 5 year window, it will be reported on the monthly compliance spreadsheet. It will detail the reasons why the EICR has not been carried out and what steps are being taken by UNSL to undertake the inspection.***
- Target date for population of the Teams online portal. The latter has now been confirmed as 31 March 2022: - ***The Connect Portal will be used for management of Electrical Inspections. It will be live by the 31<sup>st</sup> March 2022.***

#### **Asbestos surveys**

- The denominator – namely exactly how many properties were constructed pre-2000, and therefore require an annual inspection: – ***The number of properties that were constructed pre 2000 and have a requirement for an annual asbestos inspection under The Control of Asbestos Regulations 2012, will be recorded on the Connect Compliance Portal. A full list of those same properties will be available to be downloaded if required. This number will also be detailed on the monthly compliance spreadsheet.***
- The asbestos containing properties number: ***The number of properties that were constructed pre 2000 and have a requirement for an annual asbestos inspection under The Control of Asbestos Regulations 2012, will be recorded on the Connect Compliance Portal. A full list of those same properties will be available to be downloaded if required. This number will also be detailed on the monthly compliance spreadsheet.***
- The inspection rate – namely exactly how many properties have been inspected for asbestos, and a percentage proportion of the denominator: - ***The number of properties that have been subjected to an Asbestos Inspection will be recorded on the Connect Compliance Portal and will be shown as a percentage against the Denominator. This will also be detailed on the monthly compliance spreadsheet as both a numerator and a percentage.***
- The proactive reinspection rate – the percentage proportion of those found in the first inspection to have contained asbestos that have been proactively routinely reinspected within the agreed [12 month] window: - ***Prior to the start of the JV contract, UDC informed Norse that all properties where compliant with respect to the Management of Asbestos. UNSL now undertake re-inspections on a rolling programme in order that all properties built prior to 2000 will be inspected every 5 years. The exception to this will be any***

***property that following risk assessment is deemed High Risk or where asbestos has been disturbed by any means.***

- The reactive reinspection rate – the percentage proportion of those where specific concerns of disturbed asbestos have been reported that were reinspected within one day of the report: - ***In the event that a reactive report is logged with UNSL by any means / person, UNSL will undertake an inspection and testing of the area of concern on the same day that it was reported. Post inspection, UNSL carry out any remediation works using a specialist asbestos contractor and implement an asbestos management programme for this property with re-inspection in 12 months, unless the remediation works resulted in total removal of any asbestos containing material. Any incident of this nature will be reported on the monthly compliance spreadsheet.***
- For any of those properties inspected and found to have any asbestos and where a need for its removal was identified, we require adequate details for each specific named property including when that removal is scheduled for: ***Where the asbestos survey identifies that a property has asbestos that needs to be removed, it will be managed by UNSL using a competent asbestos removal contractor. All records relating to the removal will be stored in the compliance portal for future reference and details of all asbestos removals carried out in the month being highlighted on the monthly compliance spreadsheet.***
- Target date for population of the Teams online portal. The latter has now been confirmed as 31 March 2022: - ***The Connect Portal will be used for management of Asbestos. It will be live by the 31<sup>st</sup> March 2022.***

#### **Lifts and stairlifts**

- The denominator – namely exactly how many lifts and stairlifts are installed, and therefore require [annual] inspection: – ***The number of properties which have a requirement for an annual inspection under the Lifting Operations and Lifting Equipment Regulations 1998 [LOLER Regulations], will be recorded on the Connect Compliance Portal. A full list of those same properties will be available to be downloaded if required. This number will also be detailed on the monthly compliance spreadsheet.***
- The numerator inspection rate – namely exactly how many lifts and stairlifts have been inspected, and a percentage against the denominator: - ***The number of properties that have been subjected to an inspection under the requirement of the LOLER Regulations, will be recorded on the Connect Compliance Portal. This will be shown as a percentage against the Denominator and will also be detailed on the monthly compliance spreadsheet as both a numerator and a percentage.***
- The success rate – namely how many lifts and stairlifts have passed the inspection, and a percentage against the denominator: - ***The number of properties that have fully passed the LOLER Regulations required Insurance inspection, will be recorded on the Connect Compliance Portal. This will be shown as a percentage against the Denominator and will***



*also be detailed on the monthly compliance spreadsheet as both a numerator and a percentage.*

- For any of those lifts and stairlifts inspected and found to have any defect, we require adequate details for each specific named item of equipment (as specified above) – ***Any Lift or Stairlift in which the Insurance Inspection highlights defects will be reported on the monthly Compliance Spreadsheet. Any defect will be actioned in accordance with the SLA's within the contract.***
- For equipment not inspected but are not out of the 12-month inspection window, we expect confirmation that each is programmed in for the following month: – ***The Connect Compliance Portal has a front page for each compliance discipline and has a next month, two month and annual inspection key. This allows UNSL to adequately plan future Insurance Inspections required under the LOLER Regulations throughout the year. Future functionality will allow orders to be directly placed with nominated specialist directly by the system.***
- For any properties that were not inspected and are now outside the 12-month inspection window, we expect full details of the action being taken to rectify the programme slippage: – ***In the event that an insurance inspection is not undertaken, it will be reported on the monthly compliance spreadsheet. It will include the reasons why the inspection has not been carried out and what steps are being taken by UNSL to undertake the inspection.***
- We would expect the SIMPRO portal to be populated by 31 December 2021, including any back log of reports since [1 April 2020] not yet uploaded: – ***The Connect Portal will be used for management of Lifts & Stairlifts. It will be live by the 31<sup>st</sup> March 2022***