

PATH TO COMPLIANCE FOR UTTLESFORD DISTRICT COUNCIL

Abbreviations:

UDC – Uttlesford District Council, UNSL – Uttlesford Norse Services Ltd
 DH - Director of Housing/Deputy Director of Housing, UDC

CEO – Chief Executive UDC
 OD- Operations Director, UNSL

HIGH PRIORITY ACTIONS

Required outcome/purpose		Actions required to achieve outcomes	Who	When by (end of)
H1	Commence new approach to joined up working across UDC Housing Management Team and UNSL Property Maintenance Team	<ul style="list-style-type: none"> i. Launch weekly ‘Maintenance Touch Point’ sessions, bringing together senior managers from both teams, so that operational issues can be raised, and actions agreed. A dynamic action plan to be created and re-visited at each meeting. ii. Ensure information from Maintenance Touch Point meetings flows into Liaison Board meetings, to highlight areas of good practice and areas of concern 	DH	Sep 2022 Complete
H2	Commission inspection visits for all homes known to be out of target, across gas and electrical safety inspections	<ul style="list-style-type: none"> i. Commission additional electrical contractors to deliver on all inspection programmes, to include ensuring that all C1 and C2 remedial actions are carried out on site at time of inspection ii. In liaison with UNSL and working across UDC’s Housing Management and Legal Services, take immediate and appropriate enforcement action to gain access, instigating legal proceedings where required iii. Where there is not sufficient capacity within the Council, contract out legal work to specialist housing solicitor 	OD UDC UDC	Aug 2022 Complete
H3	Review governance framework, to ensure Members have appropriate and timely oversight of this action plan and are fully engaged with the self-referral process	<ul style="list-style-type: none"> i. Develop and embed a new governance structure for compliance reporting, to ensure the Council’s Executive and Senior Members fulfil their obligations in terms of the Co-Regulatory approach ii. Provide necessary briefings to Members, to familiarize them with their obligations in relation to housing 	DH/CEO	Sep 2022 Complete
H4	Ensure all council housing assets are included in the compliance programme, unless formally excluded	<ul style="list-style-type: none"> i. Download the full property asset list from both housing management (rents) system held by UDC and asset management system held by UNSL ii. Agree one complete asset schedule – to be signed off by UDC iii. From the agreed asset schedule, confirm which properties are subject to each compliance regime and record this. All properties will be deemed to be requiring an inspection unless evidence can be provided as to why they can be excluded. iv. Excluded properties to be recorded 	DH/OD	Sep 2022 Complete

Required outcome/purpose		Actions required to achieve outcomes	Who	When by (end of)
H5	Review performance management approach and data reported	<p>i. Identify how compliance is being reported – review current performance reports in respect of: Gas safety, annual programme, domestic and where applicable, communal areas Electrical safety, 5-year programme to reflect best practice and mirror private sector requirements (domestic and communal areas) Fire safety – FRA inspections, reviews, follow-ups on recommendation Asbestos – (Communal areas) Water Hygiene Lifting equipment – LOLER Smoke detectors and Co2 alarms</p> <p>ii. Identify when and where compliance is reported by UNSL to the council, and to whom within the council it is currently being reported</p> <p>iii. Identify whether compliance performance reports contain:</p> <ul style="list-style-type: none"> • Number of assets owned (domestic and non-domestic) ‘ • Number of assets on the compliance programme • Number of assets not on the compliance programme • Properties with an overdue inspection record • Properties with no inspection record • Properties within 30 days of their current inspection expiring • Follow on actions required (especially in relation to fire safety) • Comments on current position and actions being taken to resolve issues 	UDC via EELGA	<p>Aug 2022 Complete</p> <p>Aug 2022 Complete</p>
H6	Identify true compliance position to assess any gaps and report back to council Executive	<p>i. Validate compliance performance data to ensure that performance reported can be evidenced</p> <p>ii. Reconcile inspection reports against properties</p> <p>iii. Validate a selection of compliance inspection records to ensure they are valid and in-date</p>	DH	<p>Nov 2022 Complete</p>
H7	Training: Ensure UDC CMT/ client officers understand the legislation, regulations and obligations placed upon UDC.	<p>i. Procure suitable training and begin to deliver as a priority, for existing staff</p>	DH	<p>Oct 2022 Complete</p>

Required outcome/purpose		Actions required to achieve outcomes	Who	When by (end of)
H8	Policy review and development of new policies	i. Undertake a review of current policies across UDC and UNSL across all seven compliance areas and establish whether policies are: <ul style="list-style-type: none"> • In line with agreed strategic principles in relation to health and safety compliance • In line with regulatory/legal requirements • Clear and facilitate effective implementation • Being consistently followed ii. Where gaps exist, begin urgent action to develop and approve new policies	DH OD	Sep 2022 In progress due to changed processes for legal action and need for damp/mould policy and will include new client function
H9	Process mapping	i. Agree operational processes to effectively implement policies	DH OD	Nov 2022 See above
H10	Procedures	i. Produce comprehensive and clear procedures as a framework for how the processes will be performed and who will deliver them and in what timescales ii. Include contract monitoring and performance management	DH OD	Nov 2022 Partially complete – see above
H11	New Reporting Framework	i. Ensure the Connect performance dashboard contains metrics which are approved by UDC and can provide an accurate, ‘real time’ position on the elements described in Action Point H5 above.	OD	Nov 2022 Complete within the limits of Connect– but data coming over to UDC
H12	Resource review – to ensure appropriate resources are in place to deliver improvements, across both the council as a client and its contractor partner	i. Carry out a headline appraisal of the capabilities and capacity within the councils’ housing client team and operational service team which has any retained responsibility for ensuring property compliance ii. Assess the effectiveness and impact of the current delivery model (via the joint venture with Norse Commercial Services Ltd) ii. Make recommendations to the Council in relation to the above on gaps and urgent priorities for building capacity and resource	UDC via EELGA	Oct 2022 Complete
H13	Fill capacity/competency gaps	i. Based on recommendations arising from H14, bring in required additional resource to ensure services have the capacity to deliver iii. Identify training needs for new staff on relevant areas of compliance, appropriate to their roles	UDC via EELGA	Nov 2022 Complete

MEDIUM PRIORITY ACTIONS

Required outcome/purpose		Actions required to achieve outcomes	Who	When by (end of)
M1	Accurate, up to date property asset lists for the six areas of compliance	<ul style="list-style-type: none"> i. Create a formalized process for capturing property asset data, for the Connect compliance system ii. Create a formalized process for updating property asset data in real time iii. Write these processes into procedure, provide appropriate training so that staff are clear on their responsibilities and hold staff accountable to following processes 	OD	Dec 2022 Data being moved to UDC
M2	Ensure that UNSL operatives and sub-contractors carrying out compliance testing and remedial works are skilled, fully trained and accountable	<ul style="list-style-type: none"> i. Review current contract management arrangements as part of the work commissioned by the council to the East of England Local Government Association and ensure that any recommendations take into account housing service delivery and as a priority, health and safety compliance ii. Consultants to make recommendations to council on how to ensure robust arrangements for contract management going forward, including a contract register relating to each of the six areas of compliance iii. Formalize arrangements for effective contract procurement which results in competent contractors being appointed, appropriate to the services they are required to provide iv. All contracts to set out key performance metrics and include operational processes which are clear and reflect the Council's and UNSLs updated policies v. Put in place a contract monitoring regime which holds contractors to account and includes regular client-led meetings and where there is clear audit trail for meetings which includes: Terms of Reference for meetings/Agendas/Minutes and where standing agenda items include risk assessment, performance metrics against delivery and early escalation of issues which may impair the effective delivery of contracts vi. Put in place an annual competency assessment process for all UNSL operatives, which includes qualifications and accreditations, so that the Council can be assured that contractors are appropriately qualified to carry out the activity for which they contracted. Create a clear audit trail to provide assurance that this is being done 	UDC, via EELGA OD/DH OD/DH OD OD	Oct 2022 In progress as part of review of future repairs and maintenance arrangements New KPIs will be in place 2023-4

Required outcome/purpose		Actions required to achieve outcomes	Who	When by (end of)
M3	A future-proofed performance management framework to meet new regulatory/legislative requirement	<ul style="list-style-type: none"> i. Ensure that performance reports comply with the new regulatory framework/new social housing legislation ii. Prepare to publish on an annual basis, performance against national standards, as required by the new regulatory framework 	DH	<p>Mar 2023</p> <p>In progress</p>
M4	Effective audit programme in place and embedded into the Council's governance and assurance framework	<ul style="list-style-type: none"> i. Internal audit plans to be developed which reflect the critical nature of health and safety compliance. Initially annual internal audits should be considered, and this can move to every two years once there is confidence that new management/contract arrangements are embedded ii. Programme external technical audits to give assurance on the quality of inspection records and fieldwork 	CEO/DH	<p>Oct 2022</p> <p>In progress – will be in place for 2023-24</p>
M5	Moving to Business as Usual after Self-Referral, Residents are kept informed and given the opportunity to provide feedback on the service	<ul style="list-style-type: none"> i. Put in place a proactive communications campaign, to keep residents informed on keeping themselves safe and the actions which the council is taking to provide safe homes ii. Seek feedback from residents on how safe they feel in their homes, as part of the new Tenant Satisfaction Measures iii. Act upon the views of residents who provide feedback or make complaints about the service, in accordance with the Housing Ombudsman's Complaints Handling Code iv. Publish performance information as required by the Regulator for Social Housing, via the Housing Annual Report and tenants' newsletters v. In the spirit of co-regulation, provide appropriate opportunities for residents to scrutinize performance, via organised activities and through co-opting tenants onto appropriate council committees/panels 	DH	<p>Dec 2022</p> <p>Complete – tenant consultation exercise will take place this summer, for all tenants who have made a complaint about repairs in the past</p>
M6	Ensure robust and auditable governance arrangements are in place	<ul style="list-style-type: none"> i. Select an accountable person for building safety, to comply with the requirements of new and emerging legislation. Accountable person to be senior UDC officer, technical ii. Select an accountable person as lead contact for regulatory issues, to comply with the requirements of new and emerging legislation. Accountable person to be Executive Officer of UDC. iii. Develop an accountability framework for property compliance so that everyone is clear about their roles and responsibilities going forward iv. Develop and implement a clear 'empowerment and escalation' policy, so that responsible staff are clear that where issues arise, they know how to escalate concerns and who they should be escalated to 	CEO (to select)	<p>Nov 2022</p> <p>Partially complete – accountability framework will be within policies and new performance management framework</p>