

Summary of Compliance Management – Primarily Fire Safety Avoiding Serious Detriment

Introduction

During January to March 2018, we undertook a Scrutiny of PA's Compliance Management. primarily Fire Safety for Case House managed properties, to be assured that serious detriment is avoided. Our focus point was the question: Is PA ensuring that all its properties and estates are safe?

Compliance Management is a crucial area of PA Housing's operation as it ensures safety of residents, visitors, staff and contractors in its homes and on its estates. It is also important in demonstrating legal, regulatory and good practice requirements in this regard.

The scope of the overall Scrutiny is to review PA's Fire Safety Management and ensure that it meets good practice standards, that any issues are successfully managed to avoid serious detriment in resident's homes and for the Association itself.

To do this, the scope of the Scrutiny was to look at how PA Housing manages fire safety across the range of properties in its portfolio. Our aim was to review how PA ensures compliance around Fire Safety, how it communicates its work internally, kept residents informed, manages the demands of external agencies. and to briefly review the other Health and Safety areas of gas safety and asbestos management.

Overall Conclusion

Overall, we concluded that the evidence from our Scrutiny indicates that PA have continually met and have exceeded the standards required and have a very well planned programme of works that gives us assurances for now and the future. We have made some specific recommendations to support this and suggest where matters can be further improved.

Context of the Service

The general context of the service is as set out in Phase 1.

Considering Value for Money is normally a feature of our Scrutiny. This is something that was discussed with staff that we met during our programme. Likewise, Social Value is normally a consideration, but given the fundamental importance of the functions in this Scrutiny, they are not highlighted in their own right.

Phase 1

Interviews, visits to high rise blocks and Independent Living Schemes

Compliance Manager

- The Compliance Manager is responsible for general Health and Safety matters.
- The Manager and Fire Risk Assessors are all NEBOSH (National Examination Board in Occupational Safety and Health) accredited which is regularly updated and increased in level and specialism.
- A key feature of PA's approach that we were advised of is a 'cross-checking' arrangement for particular areas of work. This involves work undertaken by contractors not only checked by contract managers, but also by compliance staff. It also helps with achieving better Value for Money by avoiding unnecessary works.
- The compliance team comprises of a Compliance Administrator and two Risks Assessors. The staff backgrounds are wide to ensure a comprehensive compliance fire risk assessment approach.
- KPIs are set for the achievement of required works and that all are being met or exceeded. This sometimes means undertaking works ahead of time.
- In the wake of the Grenfell Fire disaster in June 2017, additional checks have been undertaken on relevant PA buildings. Several locations above six floors are considered as being more complex risk. 'Zero tolerance' is pursued at these places. There are weekly patrols provided.
- Cladding has been checked, even prior to the Grenfell fire, and found to not to contain the material used in the cladding at Grenfell. Lower rise buildings can also be considered as high risk, such as Churchfield House (three storeys), because of the design of the building and some residents being vulnerable.
- To ensure full compliance, further work is undertaken such as more rigorous inspections, a fire risk assessor accompanying on site once per month a Neighbourhood Coordinator and Independent Living Tenancy Services Officer, checking of emergency lighting with associated works, and door knocking at Independent Living Schemes and 'high rise' blocks frequently.

Executive Director of Operations (London and South East)

- The Executive Director provided us with a background to Fire Safety in Social and other Housing. He highlighted that although this had always been important, the Lakanal fire in Southwark in 2009 and more latterly Grenfell Tower in 2017, have considerably heightened awareness. Neighbourhood Coordinators regularly make recommendations for action and identify repairs following rigorous inspections to be carried out by a contractor.
- Overall, £2m has been spent in each of the past three years, with £2m in 2018/19 to continue the fire safety works programme. This could include fire sprinklers, fire alarms upgrades, and heat and smoke detectors. In the future,

a Fire Compliance Team and Fire Safety Team is planned, in a consistent approach across PA.

- A programme of visiting people is underway, with age priority working from 90+, onward to 85+ etc., to create PEEPs (Personal Emergency Evacuation Plans).

Head of Asset Services

General

- Head of Asset Service's role, in relation to compliance, is to deliver PAs major fire improvement works arising from its Fire Risk Assessments. Also, to manage PAs responsibilities to meet compliance in relation to asbestos, legionella, gas boiler appliances, electrical safety and fire equipment testing.
- Aims and targets are that all compliance is ensured, a sufficient budget is in place and residents are educated on risks.

Fire

- The safety of materials used is ensured by compliance with standards, checks and sign-off. Unauthorised work and materials undertaken by residents is not checked, however. The Manager stated that this could give rise to a dangerous situation.
- Extra precautions have been taken since the Grenfell fire. These have included testing panels, fire risk assessments reviewed, increased inspections by Fire Team and Neighbourhood Coordinators, assurances to residents regarding fire precautions (every resident was written to), and prioritising work according to the risk.

Asbestos

- The Head is also responsible for ensuring that compliance with asbestos health and safety requirements are met. There is a duty of care to employees as well to residents. Full assessments have been undertaken so far on 99.6% of PA properties. There is no legal requirement on frequency of periodic checking. PA regards its housing stock as low risk.
- The Head considers that the budgets are adequate for the objectives. Asbestos management is monitored in the compliance KPIs.

Neighbourhood Coordinators and an Independent Living Senior Support Officer

Neighbourhood Coordinators

- Neighbourhood Coordinators advised us that their role in relation to fire safety is based upon their observation of estates and other localities. This can

include taking action on obstacles, abandoned cars and being aware of residents at risk. We were advised that Coordinators undertake regular inspections, including weekly visits to riskier locations such as 'high rise' flats. The role includes liaison with Estate Services, such as more rapid removal of rubbish from 'zero tolerance' locations.

- The Neighbourhood Services Manager was said to be the link between the Coordinators and Compliance.
- PEEP assessments are undertaken on vulnerable residents outside of Independent Living Schemes.

Independent Living Senior Support Officer

- The Officer advised us of alarm and detector checks. The support officers are on-site most days to observe, with site inspections being undertaken monthly. PEEP Assessments are undertaken on vulnerable residents in Independent Living Schemes.

Visited a number of general needs blocks above six storeys ('high rise')

In order to witness the challenges faced in higher blocks, we visited New Malden Kingston upon Thames, and Walton on Thames. We were accompanied by PA Fire Assessors, who were of great assistance in helping us to access areas we could not on our own, such as riser cupboards, lift motor rooms and boiler rooms.

They were extremely helpful in pointing out to us good and bad practice. Good included movement sensors on lighting, a programme of fire doors being fitted, also a few issues we would have considered a fire risk, but explained were not, such as pot plants, doormats and pictures. This reinforces the thinking referred to earlier: If it feels like home, it will be treated more like a home.

Good Practice also included an example of anticipating new regulations requiring cabling to be held in metal clips rather than plastic.

A key feature of PA's policy at these locations is 'zero tolerance' toward risk of fire. All areas were clear of trip hazards, no obstructions such as bikes, pushchairs, etc. and fire doors properly installed.

Visited a number of Independent Living Schemes of various sizes (rented and Leasehold Schemes some with on-site Managers)

We visited Weybridge, Cobham and leasehold in (Richmond upon Thames. A Fire Risk Assessor accompanied us. Once again, this gave us access to areas we could not otherwise have seen. We saw that some schemes need major fire related works, whilst at others there were no major concerns. They are all continually monitored.

We also witnessed a Fire Risk Assessor removing fire extinguishers from communal areas to a locked electrical cupboard. It was explained that these could be a hazard in untrained hands.

At leasehold schemes with on-site managers, managers test their fire alarms weekly. This does not take place when the manager is on holiday.

Good features we noted were smoke detectors at sites, awareness of residents as to when fire tests are scheduled, up to date PAT tested equipment and RCD (Residual Current Device) sockets in communal areas.

Interviewed operational and administrative staff from Compliance and Asset Services Teams

- Members of the asset and Fire Safety team were interviewed. Roles include arranging fire testing, both for existing properties and for new builds at handover. Fire testing covers door closures and doors, emergency lighting, fire alarm systems and equipment, automatic air vent opening, signage, replenishing lighting batteries, and updating data on the systems, including to iAuditor which helps with general repairs. Presently, a list of fire detectors and panel ages is being compiled. Fire panels are being harmonised to one supplier. Integral to their work is ensuring Value for Money. The team applies expertise on works needed (e.g. types of windows) to ensure fire safety.
- On occasion residents can obstruct testing taking place, such as by denying access. There is sometimes a lack of understanding on the part of residents as to the requirement to change and works that need to take place. Better communication is needed. On the other hand, the team wish to work with resident groups to engage on fire safety matters.
- We were advised that the response to the Lakanal House fire in 2009 was something of a 'watershed' on fire safety thinking. Even though the official report on the fire was not published for quite a while with changed approaches carried out over time. The Grenfell fire disaster has however resulted in even more focus on fire safety, although within PA works were underway earlier. In the last three years £7.5m (Paragon) has been spent on such works together with revised arrangements based on practicalities.
- A Fire Enquiry Log is maintained by the Compliance Administrator for when residents make a fire related enquiry, this includes enquiries for when a fire assessment had taken place, works undertaken and what to do in the event.

Telephone discussion with Fire Safety Manager at Bede Island office

- A wide and varied telephone discussion with the Fire Safety Manager at Bede Island from this discussion it was learnt that there isn't currently a dedicated compliance team at Bede Island with the works managed by the asset team and compliance supported by a Primary Authority Scheme with West Yorkshire Fire Brigade.

- West Yorkshire is provided with fire related information on incidents and in return an interface with the fire authority is provided on lessons and issues to address. Independent Living Scheme Housing Officers undertake safety works such as fire alarm tests.
- We heard that some residents are concerned about the 'stay put' policy in blocks of flats. In addition, that the information from PA on this can be inconsistent. Another concern raised was about fire extinguishers and blankets being provided in communal areas, potentially being a risk in untrained hands.

Met a member of Surrey Fire and Rescue Service

- We met with the Watch Commander for Business Fire Safety Licencing. He described PA as having a 'belt and braces' approach to fire safety, that they are 'running not walking' and if others followed (e.g. one year fire risk assessments, 'music to his ears'), he would be 'theoretically out of a job'. He would recommend other Housing Providers to follow PA's example.
- The use of PIBs (Premise Information Box) is commended, acknowledging that they need to be kept up to date, including details on use of oxygen. Also, that a map of the building with a zoned diagram is shown.
- It was said that mobility scooters are becoming more of an issue, given their need to be stored, and that this is a management issue. Fire extinguishers in communal areas are a risk.

Met Head of Property Services and Gas Manager

- PA are responsible for annual boiler safety checks on 6,100 domestic properties (and 29 'commercial', i.e. communal boilers in blocks of flats). This is organised on a ten-month basis to ensure the annual compliance requirement. It is aimed to complete this by 1st October to be better prepared for winter. We were advised that 100% compliance is being achieved. Where required, if the resident does not give access, court proceedings are pursued, for which good records and an audit trail needs to be in place. No access can be for a variety of reasons, such as sub-letting, resident in hospital and mental health issues.
- An on-site sample of works per month is checked by another contractor to ensure validity, supported by a monthly (domestic) and quarterly ('commercial') desktop audit comprising, 100% of works.

Observing the work of PA Fire Teams testing equipment and premises

- The undertaking of fire safety checks described in the previous section in both general needs and Independent Living Schemes was observed. Any minor fire safety related repair jobs that can be undertaken are completed, with parts being carried on the van. Residents at all schemes are made aware of when

the team are due on site. At one scheme visited, residents came forward to report faults.

- Schemes where there is both stay put and evacuate policies in the event of a fire were visited.
- The team of three people undertake 1,295 tests per month. Recording of each visit's outcomes is recorded on the IT system at the end of each visit.

Observing works with the Project Surveyor

- The visit included where fire safety work was underway, for example changes to external doors, with future works planned, such as fire sensors and fire panels. The visit also included where there were completed works. It was advised that these were to a higher standard than currently required by regulations.
- Encouragement being given to shop keepers with premises under PA flats, to have heat detectors provided and fitted by PA was noted.

Phase 2 Scrutiny

Interviews

Interviewed Executive Director of Business Development and Sales

- The Executive Director has overall responsibility for Health and Safety, including the Fire Safety Policy, now covering the merged PA Housing with its recent update as at January 2018. The Health and Safety Policy was updated at November 2017. Each manager has designated responsibilities. There is a focus on safety and better homes. Staff attention is for the well-being of residents with the belief that explaining things to residents achieves more buy-in.
- Changes in law, regulations and safe practice are kept up to date with for compliance, including the use of independent qualified experts. For example, increasing smoke detectors in common areas and lifts that can be used in a fire. It was advised that national advice can be patchy. However, the Director is satisfied that PA is up to date. There is an extensive programme of works to support PA's Fire Safety Strategy.
- The expertise of fire and other compliance staff within PA is used to inform the design of new developments built by PA from the very beginning. For example, the possible installation of automatic fire shutters for underground car parks. Also, making space for mobility scooters with charging points.
- The Board and all committees are very focussed on fire safety, we were told, especially since the Grenfell fire tragedy. Operationally, there has been a 'hot

line' for enquiries set up and a response log maintained. All high-rise blocks have been inspected and required work undertaken. Where any locations were found to be at continuing risk, daily inspections are being carried out.

- It was discussed what more PA could do for fire and other safety. We heard that this would be in the context of the industry moving forward. For example, development of materials for fire resistance, cladding and other building materials. Also consideration of the appropriateness of sprinkler systems in particular situations. These might be more modern versions that produce a mist rather than amounts of water that cause flood damage.

Meeting with London Fire Brigade representative

- It was advised that an important feature of fire safety is the proper use of PIBs and information on the IT portal, which can be checked on the way to a fire. The use of the available information is the responsibility of a lead officer. In addition, the importance of alarms, the view being that this is 'life over money'.
- It was clarified that the lead authority locally, under the Housing Acts, is the District, Borough or London Borough Council.
- The Fire Brigade representative commented that the Brigade are focussing on Care Homes, Independent, Assisted Living and Supported Housing and that PA's work to a higher standard in Independent Living schemes than is legislated for PA's 'common sense' approach was commended.
- We learned of an alternative approach to the PIB arrangement, known as a Gerda box. This facility enables remote access to information regarding premises. it is considered as being safer than existing arrangements.

Considered Good Practice

- The web pages from some other Housing Providers were considered. A particular area of note was the existence of Primary Partnerships with Fire and Rescue Services, including in London and with the 'local' Fire Service.
- A review of Good Practice resources available on the Internet was studied. Of particular interest was Fire Safety in Housing. The National Social Housing Fire Strategy Group (NSHFSG) was formed in 2011 and its membership is made up of Social Housing providers across England and Wales. One of the main aims of the group is "to establish and impact on national policy in relation to fire safety in our communities".
- It is important that PA remain up to date with lessons and test technology.

Benchmarking and KPIs

- As noted in our reflection on House Mark, there appears to be no benchmarking activity around Fire Safety. However, there are KPIs set by PA to monitor performance. In the PA Performance KPI Report December 2017, it is stated that for former PA stock the number of Fire Risk Assessments overdue were 0% (within a target of <5%), with no 'intolerable' risks outstanding. There were 11 'substantial' actions overdue against a target of zero. This risk is indicated as red (failed).

Visited another Housing Provider

- We visited the Resident Panel at Wiltshire Council as they had undertaken a Scrutiny on Fire Safety, although in their case, focussing on Sheltered Housing (Independent Living). We learned about the effectiveness of using email for resident survey (218 respondents out of 3,300, over 6%).

Conclusions

- The Scrutiny indicates that the statement in PA's Corporate Plan regarding the response to the Grenfell Tower disaster is being carried out.
- The level of formally recognised qualification training that PA compliance staff have and continue to receive is commendable.
- The 'cross-checking' arrangement to ensure compliance at PA is particularly reassuring.
- It is pleasing to note that comprehensive fire safety measures were being carried out at PA, even before the Grenfell fire disaster happened.
- It is reassuring that funding is in place for continuing fire safety works, going forward.
- The good work of PA could be undermined by Residents undertaking unapproved works.
- Good Practice of completing outcomes of Fire Alarm and associated tests straight away on the IT system via tablets, is commended.
- Encouragement for heat detectors, provided and fitted by PA, for shop premises owners is recognised as good practice, and new leases should include a provision for this.
- We are pleased to have been advised that PA are keeping up to date with legislative, regulatory and safe practice, including the possibility of installing lifts that can be used in fires.

- There is a degree of agreement between Bede Island and our Scrutiny regarding inconsistency of information given on whether to stay put or not in the event of a fire.
- It was assuring to hear the praise from both the Surrey Fire Service Watch Commander and the London Fire Brigade representative for PA's fire precaution arrangements and practices.
- The good work on the other areas of compliance, gas and asbestos is acknowledged.
- Fire extinguishers in communal areas can pose a risk because of the possibility of them being used by untrained people.
- How residents are surveyed for Scrutiny be re-considered to make the outcome more meaningful.
- How to communicate with residents who do not have English as their first language needs considering and fire safety signage can sometimes be confusing.
- There is confusion amongst residents regarding whether to stay put or evacuate in the event of a fire.
- The suggestion of the Risk Assessor that he communicate with residents via Forums and the magazine would be helpful in raising resident awareness of fire safety.
- It is important that PA remain up to date with lessons learned from the Grenfell fire tragedy and elsewhere.
- It is pleasing to note that the KPI for outstanding Fire Risk Assessments was zero. We are confident that progress toward resolving the identified outstanding actions will continue.

Recommendations

- Consistency on what is safe and not safe in Independent Living Schemes (e.g. mats, plant pots, presence of fire extinguishers) be ensured.
- Use of flammable foam by third parties as a filler may be indicative of other poor practices. PA to ensure ongoing vigilance.
- Leasehold schemes that are not fire alarm tested when the Resident Manager is on leave be properly covered as appropriate, to ensure a month between tests is never exceeded.
- Information in PIBs be accurate, complete, up-to-date, appropriately located and dated. specify vulnerability and be data protection compliance.

- Ensure that up to date, dated, protected floor plans are provided, where required, and indicate where oxygen cylinders are located.
- Fire extinguishers in communal areas be removed and explained why in the Doorstep magazine.
- Resident Surveys for Scrutinies be re-considered to make them more meaningful, such as use of an online survey or emails.
- Communication on fire safety information with residents who do not have English as their first language needs considering.
- Fire safety signage should be made clearer.
- Whether to stay put or evacuate in the event of a fire needs clarifying.
- The need for residents to seek PA consent when proposing alterations to properties be emphasised at tenancy sign up.
- The Risk Assessor meet with Resident Forums and contribute to the resident magazine to raise awareness of fire safety, including whether to evacuate or stay put in the event of a fire.
- It be ensured that Independent Living staff be as well supported by Estate Services as Neighbourhood Services.

Appendix 1 Phase 1 & 2
Appendix 2 Scrutiny Process
Appendix 3 Action Plan

Scrutiny is in two parts Phase 1 and Phase 2

Phase 1 is described as the nuts and bolts of the scrutiny.

Generally what happens is the team reviews paperwork, conducts interviews with managers, admin staff, resident's and staff from other agencies, depending on the Scrutiny that is taking place. Visit properties, and when necessary visit other housing associations. In conclusion Phase 1 examines the day to day workings of the area being scrutinised.

A final report of findings is then prepared and submitted for consideration of Phase 2.

Phase 2

The report from Phase 1 and Policies and Procedures and KPI's (key performance indicators) are examined closely. Benchmarking against other Housing Associations. Senior staff members such as Executive Directors and Heads of service are interviewed.

A final report is then prepared taking into consideration the report from Phase 1, interviews conducted, and the close examination of other information provided.

There are further stages, a Roundtable discussion takes place with managers to discuss the report, Resident Council approves the report and the Customer Service Committee discuss and note and follow recommendations.

An Independent Advisor assists the teams at various stages and during report writing. The work and conclusions are undertaken without any influence from PA Housing, however we do rely on PA to make appointments for any visits and interviews, arrange meeting rooms and provide any paperwork that is necessary.

Scrutiny Process

1. Choose a service / subject e.g. This is done through a review and planning session
2. Grounds Maintenance, Cleaning, Independent Living etc. Areas of interest are on a forward rolling plan.
3. Decide on the membership of Phase 1 & 2 and agree the appropriate leads. Discuss strengths and weaknesses of the teams.
4. Scope the chosen Scrutiny (what are the important factors relating to the scrutiny area).
5. Training and mentoring on scrutiny will be provided including for scrutiny projects.
6. Management briefing to all members of the relevant scrutiny project (The relevant manager will outline their role and those of staff in their department(s)).
7. Call for documents with the relevant Head of Service will be discussed (The scrutiny team can request any relevant paperwork that may be helpful to the project).
8. Staff briefing (The scrutiny team will inform staff involved to inform them what, when and how the scrutiny in their area will be carried out). With particular emphasis that this is confidential to the scrutiny team and nothing personal but about the process.
9. Phase 1 team will commence scrutiny. (after the first week and at the end of the phase 1 process, the lead of phase 1 will update the phase 2 lead of the report)
10. Who do we need to interview?
11. What questions should we ask?
12. Interviews; (staff and outside agencies, local councils, charities, citizens advice etc. During interviews and focus groups as much information as possible needs to be written down. Only note written down can be used as evidence when the report is written.
13. To avoid staff or outside agency members attending twice for interviews; Phase 2 members may sit in on interviews held during Phase 1.

Gather information –

- Focus Groups (talk with residents)
 - The use of surveys
 - Mystery shoppers.
 - Benchmarking (comparison with peer and other businesses).
 - document folder.
 - Key performance indicators (KPI's).
 - Any other relevant data (website searches etc.).
 - Visit relevant sites and offices.
 - Report writing (carried out with an independent advisor).
14. The Phase 1 report, including conclusions, recommendations and evidence file is then presented to the Phase 2 Team by the lead of Phase 1 Team. All written notes will be added to the scrutiny box for future proofing and a constant reference.
15. Phase 2 begins by examining the report and evidence file supplied by Phase 1 Team. Phase 2 will then carry out the same programme as Phase 1 but will interview more senior staff and will look at the scrutiny in a more strategic way (what are the plans going forward). Consider Value for Money (VFM). And include good practice (gathered from CIH, Tpas etc.) which we will be included in the appendices to the report. The good practice is generally sourced by the Independent Advisor.
16. After the first week and at the end of the report writing stage, the lead of phase 2 will contact the lead of phase 1 to update on the project.
17. When Phase 2 have completed their final report, it is then passed on to the Executive and Managers of the department to prepare a Roundtable discussion. **(At this stage the report is for scrutiny members and Senior staff only, it remains confidential).**
- The Roundtable (1) is made up from:
 - Executive of Department
 - Managers of Department
 - Resident Involvement Manager
 - Scrutiny Leads from Phase 1 & 2
 - This is to discuss the finding of the final report and make and agree any obvious changes and agree to right any incorrect information; but the fabric of the report remains intact.
18. Once approved the report is then presented to the Customer Forum and Resident Council for their approval; together with the Action Plan set by Management to meet each and everyone of their recommendations in the report.
19. Finally the report is presented to the Customer Services Committee (CSC) by the Phase 2 lead. The CSC is made up of Board Members, Senior Management and residents.

20. Roundtable (2) The Leads of the scrutiny, Resident Involvement Manager and the relevant Dept. Manager(s) will meet within 6 months to review the action plan.
21. Periodically the Customer Forum and Resident Council will revisit the action plan to ensure that any recommendations have been carried out to total satisfaction.

Appendix 3

Fire Safety - April to May 2018					
No.	Recommendation	Action	Owner	By When	Progress to Date
6.1	Consistency on what is safe and not safe in Independent Living Schemes (e.g. mats, plant pots, presence of fire extinguishers) be ensured	<ul style="list-style-type: none"> Require new Independent Living staff to complete a joint estate inspection with a member of the compliance team as part of their induction process. Complete joint inspections with any Independent Living staff that have not yet completed one. 	KMc	June 18	Update: 8 August 2019: Completed with induction of IL Neighbourhood Co-ordinators
6.2	Use of flammable foam by third parties as a filler may be indicative of other poor practices. PA to ensure ongoing vigilance	<ul style="list-style-type: none"> Brief contractors/third parties about the correct materials to use. Brief contractors to report back any breaches in fire compartmentation found Brief property inspectors to report back any poor practices found 	CE / KMc	On-going	Update: 8 August 2019: Completed. PA term contractors advised. FRA reviews will identify fire stopping breaches and remedial actions going forward.
6.3	Leasehold schemes that are not fire alarm tested when the Resident Manager is on leave be properly covered as appropriate, to ensure a month between tests is never exceeded	<ul style="list-style-type: none"> Leasehold Independent Living team to co-ordinate testing of fire alarms panels to provide suitable cover during periods of leave or absence 	LW	April 2018	Update: 8 August 2019: Completed. IL contact building services team to carry out alarm testing when staff are absent.
6.4	Information in PIBs be accurate, complete, up-to-date, appropriately located and dated; specify vulnerability and be data protection compliant	<ul style="list-style-type: none"> Specify content of PIBS Create a register of buildings with PIBs Nominate a named person to maintain each PIB Independent Living to work with Asset Management to insure each 	KMc	Sept 2018	Update: 8 August 2019: Pending.

		PIB is updated.			
6.5	Ensure that up to date, dated, protected floor plans are provided, where required, and indicate where oxygen cylinders are located	<ul style="list-style-type: none"> Produce building layout diagrams in conjunction with the fire alarm works 	CE	Link with FSIP On-going	Completed. Building plans being provided when new fire alarm systems are installed.
6.6	Evidence and information for FLASH is provided in a timely manner by relevant staff	<ul style="list-style-type: none"> Produce an itemised action plan for the close out of all outstanding tasks 	CE / RS	April 2018	Update: 8 August 2019: Completed. A review of all open actions has been carried out and Flash has been updated to close done completed tasks.
6.7	The Gas Safety Team be involved as early as possible in specifying equipment and design of gas works for new build	<ul style="list-style-type: none"> Development team to include the Gas Manager in the planning/design stage where PA has design input. 	CW	On-going	Update: 8 August 2019: Completed. Employers requirements brief in place which specifies our preferred specification.
6.8	Fire extinguishers in communal areas be removed and explained why in the Door Step magazine	<ul style="list-style-type: none"> PA has removed all portable fire extinguishers from the shared areas, but any further extinguishers found will be removed. 	CE	On-going	Update: 8 August 2019: Completed.
6.11	Resident Surveys for Scrutinies be re-considered to make them more meaningful, such as use of an on line survey or emails	<ul style="list-style-type: none"> As part of the Planning process survey areas will be agreed and sent out so that survey material is usable by both Inspectors and Scrutiny Team at each project. 	SM	April 2018 and then ongoing	Update: 8 August 2019: Completed.
6.12	Communication on fire safety information with residents who do not have English as their first language needs considering	<ul style="list-style-type: none"> This will be considered before any general communications are produced. 	NC	On-going	Update: 8 August 2019: Completed.

6.13	Fire safety signage should be made clearer	<ul style="list-style-type: none"> This is part of the FRA process and is continually monitored. Fire action notices will also be reviewed and reinstated where necessary following internal cyclical decorations. 	KMc / CE	On-going	Update: 8 August 2019: Fire signage will be identified as part of the FRA review and raised as a task if required. PA has created new evacuation notices and these are being installed to blocks with fire alarms initially and will then be rolled out to all blocks with internal shared escape routes.
6.14	Whether to stay put or evacuate in the event of a fire needs clarifying	<ul style="list-style-type: none"> New fire action notice wording has been agreed. New fire action notices will be provided in all schemes which reinforces the message that if they feel at risk for whatever reason they should evacuate to somewhere safe. 	KMc / CE	IL and complex schemes by July 2018	Update: 8 August 2019: New fire action notices created and being installed.
6.15	The need for residents to seek PA consent when proposing alterations to properties be emphasised at tenancy sign up and subsequently	<ul style="list-style-type: none"> Residents told us during customer journey mapping that they do not want lots of information at sign up and this process now takes place at the property with limited information provided. Information will be given at the 4 week tenancy visit by the Neighbourhood Coordinators. 	RS	On-going	Update: 8 August 2019: Will be kept under review and aligned with best practise.
6.16	The Risk Assessor meet with Resident Forums and contribute to the resident magazine to raise awareness of fire safety, including	<ul style="list-style-type: none"> Articles in fire safety will be issued in the resident magazines and website to raise awareness. New fire action notices are being 	KMc	July 2018	Update: 8 August 2019: Fire Safety supplement included in latest Door Step magazine. RA's have

	whether to evacuate or stay put in the event of a fire	produced for all buildings with shared communal areas and will provide a clear message in what action to take if people believe they are at risk.			not been invited any resident forums to date.
6.17	It be ensured that Independent Living staff be as well supported by Estate Services as Neighbourhood Services	<ul style="list-style-type: none"> Estate services to get clarity from the IL team about how better they can be supported and take appropriate action as required. 	MF	May 2018	Update: 8 August 2019: Completed. A review has been carried out to define the future service and roles of Estates and IL teams which includes new estate service inspector roles to work closely with housing teams to resolve environmental issues.

NB. The numbering within the above action plans is consistent with the numbering within the Scrutiny Reports