



Resident Scrutiny Voice Panel (RSVP)

Health and Safety Review

Service Review Panel: Kai Jackson (Chair), Carlene Wynter, Ann Bayliss, Nikki Crook, David Turner, and Archie Gibson (Vice Chair)

RSVP would like to thank staff for their support in producing this scrutiny review report. We hope our recommendations support BCHG to continue to develop its health and safety processes and procedures.

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1. Introduction

The Resident Scrutiny Voice Panel (RSVP) had identified Health & Safety as an area for their third Service Review, given the spotlight in the housing sector and importance to tenants. Adrian Eggington had given an overview presentation on Health & Safety using the three lines of defense principle adopted by BCHG. From this the aims and outcomes were derived as:

| Aims | Outcome |
|---|---|
| To review how the business continuity arrangements work for out of hours and weekend cover | Learn about the Culture |
| To understand the qualifications and level of expertise used by BCHG to keep buildings safe | To gain assurance on by the measure of Competence |
| To identify any key issues with component failures and asset strategy. | The quality of Components |
| To highlight how communication can be improved | Accessibility and readability of Communication |

| | |
|---|---------------------------------|
| To have clarity on the proportion of rent invested on Health and Safety | Level of real investment – Cost |
|---|---------------------------------|

2. Approach

The review had 2 key steps in each area identified:

1. To understand key activities
2. To present findings and positive practice

Given the nature of this scrutiny task, it was difficult to interview tenants, therefore most of the evidence gathered for this review is based on desktop, reviews of policy and procedure documents and interviews with BCHG staff.

3. Desktop Review

A review of legislation/ good practice

Summary of findings

Home Consumer standard

“The ability to meet statutory health and safety requirements relies on providers having good quality data about their tenants and their stock, and being able to demonstrate that the data is accurate. Holding good quality data enables providers to better assess and manage risks”.

<https://www.gov.uk/government/publications/consumer-regulation-review-2020-to-2021/consumer-regulation-review-2020-21>

BCHG use PIMMs system, which is separate from the Open Housing System and Service Connect used for day-to-day repairs.

HHSRS

The housing health and safety rating system (HHSRS) is a risk-based evaluation tool to help Landlords identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.

<https://www.gov.uk/government/collections/housing-health-and-safety-rating-system-hhsrs-guidance>

It is not clear if BCHG inspect homes in line with this rating.

The Health and Safety at Work Act 1974

A primary piece of legislation covering occupational health and safety in UK. Duties that BCHG has as an employer to its employees.

<https://www.hse.gov.uk/pubns/law.pdf>

BCHG promote a culture of Health and Safety and have appointed Health and Safety Co-ordinator that sits under HR Team.

Training

All those who work for BCHG including contractors need to know how to work safely and without risks to health. BCHG must provide clear instructions, information, and adequate training on:

- Hazards and risks they may face.
- Measures in place to deal with those hazards and risks.
- How to follow any emergency procedures.

There is range of training offered to BCHG employees and some are NEBOSH trained. It is not clear what training contractors have in place.

Building Safety Act 2022

Protects leaseholders by remediating historical building safety defects, and bringing in measures that will allow those responsible for building safety defects to be held to account. It overhauls existing regulations, by making clear how residential buildings should be constructed, maintained, and made safe, it introduces a new regulator.

BCHG have an Assets and Building Safety Manager in place, with required expertise.

Tenancy Agreement

A binding contractual agreement between the landlord and tenant. The BCHG tenancy agreement promotes the importance of health and safety: Section 1 (7) and Section 2 (7) access requirements to allow contractors in the home. Section 2 (7) use of premises, informs tenants to not store explosive, flammable material. (27) To test fire safety, carbon monoxide and sensors. (31) overall health and safety of staff.

Health and Safety Policy

The BCHG Policy promotes a culture of safe working. Identifies Deputy Chief Executive as the Director responsible for Health and Safety.

Asset Management Strategy

This strategy outlines BCHG intention to manage and improve its homes now and in the future. The plan outlines a 30-year expenditure at around £38.12m. BCHG work to a quality standard is defined by 4 key areas of Decency, Safety, Healthy and Green.

4. Staff Interview

Summary of findings:

Tariq Jan, Compliance Manager – Interviewed by Archie and Nikki

- That PIMMs is a manually operated system used for all compliance related activities, such as gas, electric, asbestos, uploading certification, and this is shared on the Customer Portal for residents to view.

- That external contractors with expertise are used for specialist areas such as fire, lifts, electric etc.
- That there are thresholds in place to approve works.
- That PEEP, personal evacuation emergency plans are done through customer relationship managers to support vulnerable residents.
- That mixed tenure scheme, and leasehold generally have less compliance controls and left to owners to undertake safety checks.
- That having one type of boiler model would ease pressure in sourcing parts as this has delayed getting them fixed.

Ken Harrison, Asset and Compliance Manager – Interviewed by Dave Turner and Mike Barrett

- That the PIMMs system is used to manage compliance
- That BCHG have a health and safety committee meeting on a regular basis to assess a widespread areas of risk
- That Damp and Mold issues have increased but BCHG properties are in good repair.

Richard Causer, Health and Safety Co-ordinator – interviewed by Mike Barrett and Kai Jackson

- That a customer should be invited to attend the health and safety meetings
- That communications to customers need further work.
- That lone working, trips and falls are significant areas of concern.
- That further training is delivered on H&S to staff.

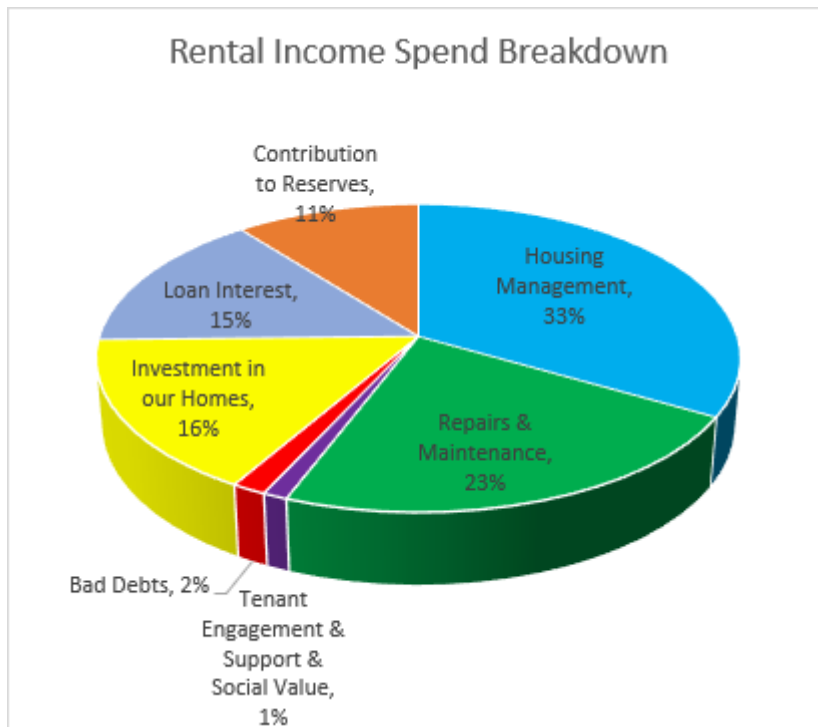
5. Financial

Aim to understand the proportion of rent invested in Health and Safety.

The Panel considered asset investment information taken from the financial statements:

| Area of Spend | 2021/22 | 2020/21 | Financial Statements Ref |
|------------------------------|----------------|----------------|---------------------------------|
| Routine Maintenance | £1.837m | £1.468m | Note 4 |
| Planned Maintenance | £0.374m | £0.305m | Note 4 |
| Capital Investment in Assets | £1.203m | £1.044m | Note 11 |

The proportion of tenants rent spent on different components is set out below:



To drill down further the Panel considered a breakdown of works completed between 01/04/2021 and 31/01/2023 for the following types of work:

- Cyclical Decorating
- Window and Door Replacements
- Electrical Safety Testing
- Fire Safety Works
- Emergency Lighting Tests and replacements
- Carbon Monoxide Alarms

It is evidence that BCHG are investing money to make sure that tenants are safe, with the IFF tenant survey showing a positive 87.39% of tenants feeling safe. Those that do not feel safe indicate the need for BCHG to modernize their homes citing windows, bathrooms, and kitchens.

6. Findings

A summary of all the key findings

- That BCHG promote a culture centered on tenant safety and full compliance evidenced through the policy, 3 lines of defense, membership of the Health and Safety Panel, empowerment of frontline staff to address local issues.
- That out of hour arrangement is in place with a new external contractor and backed by Rota of BCHG staff on duty call.

- That there are roles and responsibilities assigned to oversee Health and Safety, split between assets Building Safety Manager and people Health and Safety Co-Ordinator.
- That several staff had undertaken National Exam Board for Occupational Health and Safety (NEBOSH)
- That BCHG maintain asset records on a system called PIMMS as 'single point of truth' with a 30-year plan, recording safety check dates.
- That BCHG have different models of boilers and sourcing parts can be challenging, leading to delays in getting the heating system fixed, and the complaint log shows an increased issue with heating systems.
- That BCHG carry out a stock survey of 20% of assets on a yearly basis and cover all homes within 5 years.
- That safety information is delivered to tenants through the Portal.
- That BCHG do not have high rise buildings over the threshold of 11 meters.
- That 87.39% Tenants feeling safe within their home, compared to an average benchmark of 78.10% (IFF).
- That financial investment into health and safety is being made but difficult to distinguish and could be broken and made easier to understand for both tenants and staff.

7. Recommendations

The Panel are making the following recommendations:

| No | Recommendations | Finding |
|---|--|---------|
| 1. | Review all health and safety type communications to tenants and adopt a plain English and easy to read style. | Sec 4 |
| Management Response: Agree and this will be incorporated within BCHGs new Communications Plan which will also support the implementation of the Tenant Satisfaction Metrics Implementation Date: March 2024 | | |
| 2. | Publicise all the areas of health and safety compliance covered by BCHG; many of which were unknown to the Panel | Sec 3 |
| Management Response: Agree and this will be incorporated within BCHGs new Communications Plan which will also support the implementation of the Tenant Satisfaction Metrics Implementation Date: March 2024 | | |
| 3. | Develop an offer that can extend compliance related work to leaseholders | Sec 4 |

| | | |
|--|--|----------|
| <p>Management Response: Agree in principle for gas and electrical safety works. This plus the wider health and safety offer will be discussed at the Leaseholder Forum that will be re-convened in 2023.</p> <p>Implementation Date: September 2023</p> | | |
| 4. | Clarify roles and responsibilities for tenants to understand how to access and signposts to appropriate systems | Sec 3, 4 |
| <p>Management Response: Agree and this will be incorporated within BCHGs new Communications Plan which will also support the implementation of the Tenant Satisfaction Metrics</p> <p>Implementation Date: March 2024</p> | | |
| 5. | Review the current asset system so that information is not held in isolation from other systems, to create the one source of truth approach. | Sec 4 |
| <p>Management Response: Agree and will be part of the current Core Housing System review and tender process with the potential for the replacement of PIMSS by reviewed in 2024 after the core housing system is replaced.</p> <p>Implementation Date: December 2024</p> | | |
| 6. | Review component failure on boilers and whether a universal model approach would ease the sourcing of parts. | Sec 4 |
| <p>Management Response: Agree in terms of better usage of our data in terms of component failure. We do tend to fit standard boiler types at present although some new developments may have had contractor led solutions. However new homes are now being delivered with non-gas solutions and linked to our environmental management strategy and this should be rolled out in the future to existing homes.</p> <p>Implementation Date: July 2023</p> | | |
| 7. | A tenant representative is invited to the Health and Safety Panel meeting. | Sec 4 |
| <p>Management Response: Agree, we will review how this group works and agendas to ensure that the tenant voice is heard at this meeting and while respecting confidentiality that an RSVP member is invited at least twice per year.</p> <p>Implementation Date: July 2023</p> | | |

8. Conclusion

The Panel findings do show that BCHG promote a culture centred on tenant safety and full compliance evidenced through the policy and 3 lines of defence.

Specialist experts are used and staff qualification with NEBOSH shows a good level of competency. The Panel do recommend that this highly technical area does not lose sight of the customer, and training should back this.

BCHG invest in their homes and have systems in place to monitor this. However, some customer experience shows this can be further improved, by dealing with an array of boilers and modernisation of homes.

Communication is the biggest area the Panel find can be improved, as the information is not in one source and easy to understand.