

Appendix A- Housing Improvement Plan

Action	Lead	Date	Revised target date	Status	June 2025 Update
Governance and assurance					
Recommendation 1 – Establish governance and assurance structure Establish an appropriate governance and assurance structure to provide effective oversight of compliance and building safety	Simon Hendey Gillian Knight	Feb-25		complete	Reported monthly to PAC Board as a Tier 1 project. Compliance reporting will be reported to Overview & Scrutiny committee & Cabinet on a quarterly basis from effect Q2 2025. Updates against this plan will be reported quarterly to Cabinet committee housing.
Recommendation 2 – Compliance awareness session. The Leadership Team, Board, and key individuals of WCC should undertake a detailed property compliance training session to gain a more thorough understanding of the compliance obligations and how to provide more effective oversight, scrutiny, and challenge of compliance performance.	Simon Hendey	End of June 25	Jun-25	Minor slippage	Proposed training date for in person leadership training -4th July. Awaiting confirmation of evening training session for members/TACT Board.
Data validation					
Recommendation 3 – Data Validation. Undertake a data validation exercise across asset data and compliance areas to gain assurance around all property assets, compliance programmes and records. This exercise is best completed by an independent third party to ensure a robust methodology is used and appropriate challenge is given.	Adrian Wilgoss Sarah Hobbs	Mar-25	Jun-25	On track	reviewed data validation plan across all compliance work streams, going to plan but have had to move target dates as there is follow up work to updates systems information. There are regular validation plan meetings to review progress. Domestic elec and both communal and domestic asbestos data validation is going well and information to be updated in Keystone. 10/6 - dwelling above a garage block has been identified through data work - Orchard & Keystone have been updated to ensure property will be picked up as part of stock condition survey pilot programme. Electrical & asbestos to be updated into Keystone to enable system driven KPI reporting this will include lift safety & Gas safety for review & validation to improve efficiencies.
Data validation - Establish a formal, regular and documented reconciliation process to ensure asset and compliance data remains accurate and up to date.	Adrian Wilgoss Heather Gibson	Mar-25	Sep-25	On track	reviewed data validation plan across all compliance work streams, going to plan but have had to move target dates as there is follow up work to updates systems information. There are regular validation plans meetings to review progress. Domestic elec and both communal and domestic asbestos data validation is going well and information to be updated in Keystone. Monthly reconciliation across Orchard & Keystone.
Data validation - Implement a process for tracking and monitoring the follow-up actions deriving from your compliance programmes. Each action should be documented, and you should be able to evidence that the action has been completed.	Adrian Wilgoss	Mar-25	Sep-25	On track	Process needs to be devised to enable regular property data review to ensure Orchard and Keystone systems mirror this data accurately. 10/6/25 - Manual process currently capturing detail on spreadsheets. Water hygiene programme in progress and will develop follow on actions reporting. C1 & C2 are carried out EICR documentation supports this. C3 actions not being robustly managed currently -plans to resolve this through compliance systems. Cannot confidently say how many properties we have that have C3 actions outstanding for RCD protection - do not have technology currently to read PDF certificates. Gas LGSR actions - jobs are raised and will be checked at following annual check. Asbestos actions - asbestos surveys have commenced and data will update in Keystone that survey has happened. remedial actions following Reg 4 surveys will be managed manually on a spreadsheet. Fire - FRA actions are held on a spreadsheet exported from Contractor system. Still trying to secure resource to support this work. Lift actions captured through Orchard as repair orders LOLER requirement and will include descriptions. New way of working- system driven report will be run to check jobs as part of validation. Can include outstanding Temple jobs for lifts.
Recommendation 4 – Sample records audit. Undertake a sample audit of inspection records across all programmes, to ensure that your documentation matches the information recorded within your systems.	Adrian Wilgoss	Jan-26		On track	consistent for gas, elec and lifts due to external scrutiny and best practice to be included into our policy and procedures work. The docs will be on achieving this for the big 6 compliance areas. one off sample checking in some Suggest we have a consultancy 3rd party arrangement for this area and there are external providers to enable this. this is expected to cost around £100k per annum. AW to discuss with KH re budget and discuss with policy review consultants.
Recommendation 5 – Manual processes Ensure all compliance programmes and actions are system driven in the same way your gas servicing programme is, this will reduce manual processes such as the transfer of programme spreadsheets to your contractors, to reduce the risk of human error. Consider how manual processes can be reduced generally.	Adrian Wilgoss	Jan-26		On track	Market engagement in progress to identify suitable compliance system to capture, record, track & report against all compliance related activities.
Recommendation 6 – Control and Ownership of Data Work towards holding data internally to reduce reliance on contractors portals to manage programmes and record evidence and increase assurance on programme accuracy.	Adrian Wilgoss	Jan-26		On track	Market engagement in progress to identify suitable compliance system to capture, record, track & report against all compliance related activities.

Reporting					
Recommendation 7 – Compliance reporting. Update the reports to include: Ensure each compliance area is included within the scorecard, and that each area clearly identifies what the compliance obligations are (i.e., fire risk assessments, asbestos reinspection surveys, lift thorough inspections, and so on).	Sarah Hobbs	Mar-25		Complete	Compliance reporting template provided by Penningtons being used for monthly reporting.
2. Include a performance indicator to state whether each area is or is not compliant, to clearly identify your position to the reader.	Adrian Wilgoss David Lindsay Steve Finney	Mar-25		Complete	Compliance reporting template provided by Penningtons being used for monthly reporting.
3. Include trend analysis against each area to demonstrate whether there has been an upward or downward trajectory in performance since the previous reporting cycle.	Adrian Wilgoss David Lindsay Steve Finney	Mar-25		Complete	Compliance reporting template provided by Penningtons being used for monthly reporting.
4. Include a forward outlook to highlight the number of properties due for an inspection within the next 30-90 days and any upcoming risks of non-compliance.	Adrian Wilgoss David Lindsay Steve Finney	Mar-25	Jun-25	Minor slippage	Whilst data is known, an access process needs to be devised- YA, AW and LD to discuss
5. In addition to performance with your legal obligations, highlight the number of follow up actions outstanding for each area.	Adrian Wilgoss David Lindsay Steve Finney	Mar-25	Jun-25	On track	Format for reporting follow on works being reviewed - teams being asked to report monthly on this
6. Provide supporting narrative for non-compliance and outstanding follow up actions. This information should include an explanation of the current position, corrective action required and the anticipated impact of the corrective action. Follow up actions should be documented to clearly identify the number outstanding and overdue, and highlight the risks associated with the outstanding actions.	Adrian Wilgoss David Lindsay Steve Finney	Mar-25	Jun-25	On track	Format for reporting follow on works being reviewed - teams being asked to report monthly on this. Narrative requested as part of monthly reporting
Policies & Procedures					
Recommendation 8 - Policies. Undertake a policy principle and strategic direction workshop for each compliance area to develop and finalise each policy. Ensure these sessions include the necessary strategic leaders and have technical input from operational staff. The purpose of the sessions is for leaders and stakeholders to agree strategic decisions as part of each policy's development. Following the workshops, produce a new suite of documents using a consistent approach and layout. The compliance policies should be approved by the Executive Team/Cabinet through a formal approvals process and reviewed formally every two years thereafter (or sooner if there is a change in applicable legislation or guidance)	Sarah Hobbs Adrian Wilgoss	Mar-25	Sep-25	On track	Contract award in place for Penningtons to deliver suite of updated policies and procedures for all compliance workstreams (gas, electric, lifts, water, asbestos, fire). Policy workshop scheduled for mid June
Recommendation 9 – Process maps and procedures Once your policies are finalised, ensure there is a suite of process maps and procedure documents for each compliance area. Process maps should detail each stage and those responsible for the delivery, to ensure each process is effective and efficient. Procedures should then be developed to provide the written narrative for each of the process maps. Operational staff should have their input on the key stages and responsibilities for operational delivery.	Sarah Hobbs Adrian Wilgoss	Mar-25	Sep-25	On track	Contract award in place for Penningtons to deliver suite of updated policies and procedures for all compliance workstreams (gas, electric, lifts, water, asbestos, fire). Policy workshop scheduled for mid June
Structure					
Recommendation 10 – Structure. Review the structure and the resources required to ensure there is optimal capacity for discharging your duties. Consider all areas, and any temporary and permanent resource or external support required to fulfil the recommendations from this report.	Yvonne Anderson	Apr-25	Jul-25	On track	ELB have approved Building Safety roles. Recruitment to H & S Officer and Coordinator roles anticipated to be completed by end of June 2025.
Training and qualifications					
Recommendation 11 – Training and qualifications 1. Develop a training matrix to specify the training, competence and qualification requirements for all employees responsible for oversight and delivery of compliance and building safety programmes. This will identify gaps and ensure training and competence is kept up to date. 2. Undertake a competency building programme over the next 12 months to increase staff competencies and fill any knowledge gaps. Consider the Level 4 VRQ in Asset and Building Management Compliance, or equivalent for managers and operational leads. Also consider subject specific training for staff with duties in specific areas of compliance.	Yvonne Anderson	Jan-26		On track	Training matrix to be developed alongside discovery & gap analysis work
Contract management					
Recommendation 12 – Contract management 1. Escalate the appointment of a new fire safety contractor as a matter of urgency. Consider whether this can be done via a waiver under your contract and procurement regulations	Adrian Wilgoss	End of Jan 25		complete	FRA programme in place & mobilised.
2. Apply a consistent approach to contract management for all contractors. There should be regular performance meetings, with frequencies relative to the works programmes.	Adrian Wilgoss David Lindsay Stephen Finney	End of Jan 25	Sep-25	On track	
3. All contractor meetings should be formally documented with a set agenda, minutes, and action plans produced from the meetings.	Adrian Wilgoss David Lindsay Stephen Finney	End of Jan 25	Sep-25	On track	
4. Ensure routine documented competency checks are completed on contractors (at least annually), and for any changes in contractor personnel.	Stephen Finney Adrian Wilgoss David Lindsay	Jan-26	Sep-25	On track	
5. Migrate data and records from contractor systems to WCC where possible to re-establish full control, ownership and accountability for all compliance programme data and ensure programmes are driven by WCC.	Adrian Wilgoss	Jan-26		On track	

Resident engagement					
Recommendation 13 – Resident engagement					
1. Implement a formal and coordinated approach to informing residents about each area of compliance. Develop upon your communications plan to structure how and when information will be provided. Utilise a range of channels for communication and consider how you intend to inform harder to reach groups, such as those without internet access, where English is not their first language, or those with disabilities and impairments.	Adrian Wilgoss Steve Finney Faiza Hassan Charlotte Bailey Yvonne Anderson	End of June 25	Jul-25	On track	
2. Include consideration of the legal fire and building safety requirements under the Fire Safety (England) Regulations 2022 and Building Safety Act 2022	Adrian Wilgoss Steve Finney Faiza Hassan Charlotte Bailey Yvonne Anderson	End of June 25	Jul-25	Minor slippage	
Audit					
Recommendation 14 – Internal audit					
Implement an internal audit regime which examines your adherence with relevant legislation and ensures there are controls in place to deliver programmes for each compliance area. Undertake this process at least every two years, in line with industry best practice.	Gillian Knight	Jan-26		On track	
Recommendation 15 – Technical audits					
Implement 100 per cent desktop quality assurance checks of compliance records for all areas of compliance, to provide assurance that certification has been completed and follow up works have been processed correctly.	Adrian Wilgoss	End of July 2025	Sep-25	On track	
Recommendation 16 – Third party auditing					
Implement a third-party technical auditing regime across all compliance areas to undertake sample checks on field work and desktop reviews on records. The auditor(s) should be competent and appropriately accredited.	Adrian Wilgoss	Jan-26		On track	
Gas and heating safety					
Recommendation 17 – Gas and heating safety					
1. Ensure landlord gas safety records are displayed in a prominent position in the communal areas of buildings (or provided to each resident) served by a communal gas boiler, in accordance with Regulation 36 (7) of the Gas Safety (installation and Use) Regulations 1998.	David Lindsay Fiona Churcher	Mar-25		Complete	
2. Document your access process to align with the process being used by staff and contractors. Any forced access should be first discussed with your legal team, clearly documented in the policy and procedures and used only as a last resort. Any decision for forced access should have sign off at leadership level.	Yvonne Anderson	Mar-25	Sep-25	On track	
3. Establish a procedure for following up with new tenancies to ensure that gas meters are not uncapped without your knowledge.	David Lindsay	Mar-25	Sep-25	On track	
4. Monitor properties not currently connected to the gas mains network, to ensure a gas supply has not been installed without your knowledge. Monitoring can be cross referenced with Cadent's XO Serve system to identify properties on the network.	David Lindsay	Jan-26		On track	
5. Establish programmes for servicing alternative heating installations (ground source heat pumps, air source heat pumps, etc.) in accordance with the manufacturers' recommendations.	David Lindsay	End of June 25		complete	
6. Ensure you can evidence all properties have smoke and carbon monoxide detectors installed where required, in accordance with the Smoke and Carbon Monoxide (Amendment) Regulations 2022. This should also include properties not on your gas programme.	Heather Gibson Adrian Wilgoss David Lindsay	Jan-26		complete	
Review policy decision around installing and interlinking carbon monoxide detectors in properties where the main source of heating is gas	David Lindsay Adrian Wilgoss	Sep-25		On track	
Electrical safety					
Recommendation 18 – Electrical Safety					
1. Investigate the reasons why not every property is on the electrical programme and ensure that all properties with an electrical installation are on programme.	David Lindsay Adrian Wilgoss Heather Gibson	01-Feb-25	31-Mar-25	complete	
2. Ensure you are meeting legal requirements under the Housing Act 2004 (free from Category One hazards) and Landlord and Tenant Act 1985 (Rented properties are safe at the start and throughout each tenancy). As a priority, seek access for the eight 'high-risk' properties that have never had an electrical inspection, to ensure the installation is safe to use	David Lindsay Laura Doyle	End of Feb 25		complete	
3. Reconsider your access process. Best practice would be to mirror the stages of a reliable gas process, with three scheduled and recorded no access attempts, and an escalation procedure which includes tenancy investigations ending in controlled/ legal intervention.	Yvonne Anderson	Mar-25	Sep-25	On track	
4. Ensure there is an interdepartmental approach to assist with tenancy issues that may be preventing the completion of an inspection (i.e., Housing management teams to assist with hoarding and clutter within tenanted properties).	Laura Doyle David Lindsay	Mar-25	Sep-25	On track	

Fire safety					
Recommendation 19 – Fire safety 1. Ensure that you can demonstrate all buildings not on the fire risk assessment programme are not in scope of the Regulatory Reform (Fire Safety) Order 2005. The recommended approach is to commission a competent fire risk assessor to visit the buildings and determine whether they are within scope. Obtain written confirmation for buildings not in scope.	Adrian Wilgoss	By July 25		complete	
2. Consider introducing Type 3 fire risk assessments rather than Type 1 as good practice approach to provide a more detailed block assessment, factoring in a sample of the homes within the blocks.	Adrian Wilgoss	By July 25		complete	
3. Ensure actions are completed within a reasonable timeframe, and there is sufficient funding and resource to complete actions deriving from the fire risk assessments.	Adrian Wilgoss Stephen Finney	High-Oct 25 Medium-Jan 26 Low - June 26	Ongoing	Minor slippage	
4. Ensure that all actions follow a quality assurance and approval process. Competent individuals should ensure that each action is allocated to the correct departments/contractors and then on completion actions are closed by these individuals only when sufficient supporting evidence is provided. There should be evidence and an auditable trail to support each closed action.	Adrian Wilgoss Stephen Finney	High-Oct 25 Medium-Jan 26 Low - June 26	Ongoing	Minor slippage	
5. Ensure that you have access to the Safety Culture (contractor's system) once the current contract ends or migrate the data onto an appropriate system for fire risk actions.	Adrian Wilgoss	Jul-25		Complete	
6. Procure fire risk assessor contractors without delay to ensure you have a full suite of FRA's in place for all properties falling within the scope of the Regulatory Reform (Fire Safety) Order 2005.	Adrian Wilgoss	End of Feb 25		Complete	
7. Revise your FRA tracker to ensure that all properties requiring an FRA are captured regardless of whether or not remedial actions are identified.	Adrian Wilgoss Stephen Finney	Aug-25		Minor slippage	
8. Ensure building safety case reports are in place for specific blocks of 18m or above in line with your obligations under the Fire Safety (England) Regulations 2022.	Adrian Wilgoss Faiza Hassan	Jun-25	Jul-25	Minor slippage	
8. Ensure resident engagement strategies are in place for specific blocks of 18m or above in line with your obligations under the Fire Safety (England) Regulations 2022.	Adrian Wilgoss Faiza Hassan Yvonne Anderson Stephen Finney	Jun-25	Jul-25	Minor slippage	
9. Implement a fire door inspection programme to include communal fire doors being inspected quarterly and flat front doors being inspected annually in line with your obligations under the Fire Safety (England) Regulations 2022.	Adrian Wilgoss	End of June 25		complete	
10.Ensure one version of the truth for all fire alarm and emergency light testing across all HRA stock to include temp accommodation & sheltered	Adrian Wilgoss	Jun-25		On track	Identified new action to track through service improvement work. Need to ensure all data is visible and held within systems.
11. Full M & E review of all fire alarm systems across HRA stock	Adrian Wilgoss	Mar-26		On track	Will require specialist resource to complete this activity
Asbestos management					
Recommendation 20 – Asbestos Management 1. As a best practice recommendation, consider implementing an approach to surveying your all stock with the target of achieving 100 per cent of surveys, to provide complete oversight of the locations, types, and conditions of ACMs across portfolio. We recommend a programme of management surveys for all void properties and percentage of tenanted properties each year.	Adrian Wilgoss	Apr-26		On track	
3. Ensure actions are completed within a reasonable timeframe, and there is sufficient funding and resource to complete actions deriving from the asbestos surveys.	Adrian Wilgoss	Jun-26		On track	
4. Ensure your asbestos register is fully updated to include results from all previous and newly received surveys.	Adrian Wilgoss Heather Gibson	Dec-26		On track	
5. Ensure there is an approved Asbestos Management Plan in place.	Adrian Wilgoss	Mar-25	Sep-25	On track	
Review domestic asbestos data and remove any data that does not constitute a full management survey	Adrian Wilgoss	May-25	Jun-25	Minor slippage	10/6 - have data that needs to go into Keystone. Need to agree approach to cleansing & updating cloned data within system. Potentially will need to delete cloned data one by one to ensure no wider impacts to data & systems - this is actively being investigated.
Water hygiene					
Recommendation 21 – Water Hygiene 1. Ensure all properties requiring a risk assessment are on programme. For properties not on programme, ensure there is evidence to support this decision	David Lindsay	Jan-26		On track	
2. Establish risk assessment and remediation programmes for your domestic properties. Consider your approach to risk assessing your domestic properties, ensuring it is practicable and proportionate in managing the risk. A risk-based approach would be more appropriate which targets high risk installations, properties with vulnerable occupants, risk assessing void properties, and developing your lettable standing to include removal of high-risk installations and flushing regimes.	Adrian Wilgoss	Jun-26		On track	

Lift safety					
Recommendation 22 – Lift safety					
1. Ensure the compliance team has more managerial control of the LOLER through inspection programme and formalise meetings with the lift contractor.	David Lindsay	End of Mar 25	Jun-25	Minor slippage	10/6 - awaiting contract set up. Will implement quarterly minuted meetings with monthly operational meetings to manage the lift contractors.
2. Ensure there is full assurance that WCC has no responsibility for the inspection and maintenance of any domestic lifts installed within your properties. If this investigation results in responsibilities, ensure the inspection and servicing regimes are in place.	David Lindsay Heather Gibson	Mar-25		Complete	
Direct approach to get costings for minimum of 3 quotes for external supplier to carry out full stock condition surveys				Jun-25	complete
Need to confirm future state asset system-request 5 reference sites	Faiza Hassan	Jun-25	Sep-25	on track	
Demo from Penningtons	Sarah Hobbs	End of Jan 25	To be reviewed	Not required	
set up project team to mobilise this work	Sarah Hobbs	Feb-25		complete	
Detailed brief required for stock condition surveys	Faiza Hassan	Mar-25		complete	
Agree approach for mobilising stock condition surveys	Faiza Hassan			complete	
Mobilise stock condition surveys	Faiza Hassan	Jun-25		Minor slippage	
Recommendations from Penningtons compliance healthcheck					
Begin immediately					
Begin within 1 month					
Begin within 3 months					
Begin within 6 months					