

Kirklees Federation of Tenants and Residents Associations Scrutiny Panel

Review of Communal Areas



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June 2012

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1 BACKGROUND

- 1.1 Communal areas are those areas of a house or a block of flats which individuals who live there have a right to use in common with other occupants and for which the landlord is responsible.
- 1.2 There a number of fire safety rules and regulations that are aimed at ensuring landlords take the necessary steps to minimise fire risk and provide adequate fire prevention measures.
- 1.3 This includes the Regulatory Reform (Fire Safety) Order 2005 (the FSO) which came into force in October 2006 and brought the communal areas of higher risk residential properties such as high rise flats within the scope of mainstream fire safety legislation for the first time.
- 1.4 Tenants and residents living in multiple occupation buildings often place personal possessions such as pictures and plants in the communal areas in order to create character and warmth to the spaces outside their homes.
- 1.5 However this approach can sometimes lead to conflict as many landlords adopt a policy of creating sterile areas within communal areas as a way of reducing fire risk.
- 1.6 Kirklees Neighbourhood Housing (KNH) is responsible for maintenance and repair of the communal areas. All tenants, residents and leaseholders have a shared responsibility under the Tenancy Agreement. Where KNH commission a cleaning service tenants are required as part of their tenancy agreement to contribute towards covering the costs of the cleaning contract.

2 AREAS OF FOCUS

2.1 The agreed terms of reference of the review was:

1. To review the KNH policy and how it is implemented on creating sterile areas within communal areas when considering safety and fire risk including: assessing the consistency of the approach taken by KNH; reviewing the guidance on placement and storage of personal possession ; and management of designated areas such as the storage of rubbish bins
2. To review the policy and procedures followed by KNH to undertake its responsibility in adhering to the current fire and safety regulations that apply to communal areas.
3. To review the policy and procedures for cleaning communal areas including the process that is followed in awarding cleaning contracts and monitoring the standards of cleaning.
4. Assessing how issues relating to communal areas impact on elderly, disabled and vulnerable tenants.

3 THE PANEL AND WORKING ARRANGEMENTS

3.1 The Panel comprised its membership from representatives of a number of tenants, residents and leaseholders of KNH and included:

Mr John Appleyard
Mr Glen Byrne
Miss Chris Estill (Chair)
Mrs Rebecca Farah
Mr Malcolm Hirst
Mr Ted Hinde
Mrs Valerie Kirk
Mrs Sheila Maxwell
Mr Rod McInnes

3.2 The Panel was supported by Richard Dunne from the Scrutiny Office Kirklees Council and Jill Long Co-ordinator Kirklees Federation of Tenants and Residents

3.3 The Panel held a series of meetings between December 2011 and March 2012 in order to receive information and evidence from a range of individuals. A full list of attendees and witnesses are shown on page 42.

- 3.4 The review included evidence from panel members who visited a number of blocks across Kirklees to observe issues relating to fire safety and cleaning in communal areas. Panel members visited a total of 42 blocks of which 17 were located in the North of Kirklees and 25 in the South. Details of the panel inspections can be found in appendices 1 and 2.
- 3.5 In addition some panel members took photographs of the inspected blocks, some of which is contained within this report. The Panel intends to put together a library of photographic evidence which, subject to request, will be made available to view.
- 3.6 The Panel acknowledges that the number of blocks visited represents a relatively small sample when compared to the 800 plus communal areas that are currently managed by KNH. The Panel accepts the results will not necessarily represent an accurate picture of communal areas in all blocks or reflect the standard of cleanliness being maintained by residents or the service from Kirklees Cleaning Service.
- 3.7 However the Panel feels that the inspections do provide an indication of the state of communal areas and that the results identify a number of issues that should be further investigated.
- 3.8 To help provide a level of consistency in the inspections the Panel used a communal areas checklist to assess aspects of fire safety and to rate the standards of cleanliness. Panel members comments were used to categorise the levels of cleanliness and the Panel accepts that assessing the cleanliness of an area is subjective and opinions will differ from person to person.
- 3.9 The Panel wishes to point out that during the block inspections there were examples of communal areas maintained by residents which were clean, inviting and warm environments and the Panel acknowledges that many residents take real pride in looking after their communal areas.
- 3.10 The block inspections were one method amongst a number of different approaches that the Panel used to help reach its views and recommendations. This included verbal discussions with witnesses, written evidence and desk top research.

4 SUMMARY OF EVIDENCE RECEIVED

- 4.1 This section of the report will set out for each area of focus, a summary of the key evidence that has been received, followed by an outline of the Panel's views and recommendations.

4.2

Area of Focus 1

To review the KNH policy and how it is implemented on creating sterile areas within communal areas when considering safety and fire risk including: assessing the consistency of the approach taken by KNH; reviewing the guidance on placement and storage of personal possession ; and management of designated areas such as the storage of rubbish bins.

4.2.1 Background

4.2.2 In July 2009 the KNH Health and Safety Management Group and the KNH Senior Management Team (SMT) were presented with proposals to review the fire safety policy including the management of communal areas.

4.2.3 The KNH review was carried out in conjunction with Kirklees Council's Building Control Team who KNH engage as its competent person¹ under the fire safety regulation and found that the existing policy was largely appropriate and made only minor changes to the wording.

4.2.4 In August 2010 a report 'Fire Safety Policy and Advice' was presented to the KNH Strategy Committee for a decision to approve the document ('Overview of KNH Approach to Fire Safety For The Homes It Manages') that covered the KNH approach to fire safety.

4.2.5 The report highlighted the importance of the safety of buildings, particularly the communal areas which are the landlord's responsibility and made reference to an ongoing debate within KNH on the implications of the Fire Safety Order 2005 (FSO 2005) to communal areas in blocks of flats.

4.2.6 Fire Safety guidance covering blocks of flats issued by the Local Government Group in July 2011 states that the most likely place for fire to start is within a flat. However, the guidance also highlights that fire within communal areas can be particularly dangerous.

4.2.7 The Local Government Group Fire Safety Guidance reinforces the importance of good housekeeping as a way of reducing risk in blocks of flats. It also highlights the tendency for some residents to treat the communal areas as an extension of their own home and store and display personal belongings in corridors and stairway landings.

4.2.8 The guidance recognises that many landlords battle with the issues relating to the storage and display of personal possessions in communal areas and

¹ There is a responsibility under the FSO 2005 to appoint a competent person to provide safety assistance such as guidance on the fire safety measures required by the legislation and how they should be implemented. This should be a person with enough training and experience or knowledge to enable them to properly assist in undertaking fire safety measures.

concludes that as unrestricted use of common parts is clearly not acceptable then the landlord will have to adopt one of the following alternatives: 'zero tolerance'; or 'managed use'.

4.2.9 Zero tolerance

4.2.10 The 'zero tolerance' approach is where residents are not permitted under any circumstances to store or display personal items in the communal areas. This approach ensures that all communal areas are in effect 'sterile'.

4.2.11 This approach is the simplest policy for a landlord to adopt and removes the risk from accidental fires involving items in the communal areas and it also reduces the opportunity for an arsonist to use items to deliberately start a fire.

4.2.12 This approach also helps to reduce the risk of obstructions in communal areas allowing a safe route out of the building in the event of a fire evacuation.

4.2.13 This policy makes it easier for the landlord to inspect and enforce and is clear to residents. In addition this approach should make it easier when carrying out fire risk assessments and it also has the potential to reduce any liability on landlords.

4.2.14 This approach however does have disadvantages as it can unfairly penalise those residents who wish to create a more welcoming environment and are capable of effectively managing their communal areas. It also does not take into account individual circumstances and this approach can be at risk of not being proportionate.

4.2.15 Managed use

4.2.16 The 'managed use' approach allows residents to place items in the communal areas but defines and limits what items are allowed and includes strict conditions on where such items can be located.

4.2.17 This approach does have benefits, for example by enabling residents to make the communal areas more welcoming. It helps to encourage a sense of pride and value in the building which can have a positive impact on issues such as anti-social behaviour.

4.2.18 It can also help older and disabled people by providing them with an option to store mobility aids and allows landlords to take into account the circumstances of the residents that live in the flats and to assess the specific risk factors of the building.

4.2.19 However this approach can be more difficult to adopt as it requires the landlord to produce a clear policy. There is also more scope for misunderstanding and will require effective communication from the landlord.

4.2.20 Although the restriction on the items that can be used will help to minimise accidental fires it can still leave some risk for the deliberate starting of fires. It is also more difficult for the landlord to inspect and enforce this approach.

4.2.21 The Approach taken by KNH

4.2.22 KNH has taken a mixed approach in its risk management of communal areas, with 'zero tolerance' in all communal areas in blocks of more than 3 storeys and 'managed use' in blocks of 3 storeys or less.

4.2.23 The KNH fire safety document 'Overview of KNH Approach to Fire Safety For The Homes It Manages' confirms the risk management policy in common (communal) areas and states the following:

- Common areas in blocks of more than 3 storeys should be kept totally sterile.
- Common areas in blocks of 3 storeys may only contain frame covered pictures, non-flammable ornaments and living plants (but not Christmas trees) provided they do not obstruct or create trip hazards on any evacuation route(s).
- Common areas in blocks of 2 storeys may only contain frame covered pictures, non-flammable ornaments, hardwood furniture and living plants (but not Christmas trees). Curtains and other fabric are allowed provided they display labels confirming the material is flame retardant and/or has passed ignitibility tests. Fitted carpets will be allowed – but not where non-slip flooring has been installed.

None of the above should obstruct or create trip hazards on any evacuation route(s).

4.2.24 In addition the document states that residents have no rights to store or display any item within communal areas as these are for access to and from the blocks for residents and visitors. This rule is also confirmed in the KNH New Tenancy Agreement which states in the section relating to flats, maisonettes and shared areas that tenants *"must not store anything in any shared area without our permission, in writing"*.

4.2.25 The key aspect of the policy is that the 'managed use' element of the policy is for the guidance of the 'Responsible Persons' who have the right to use their discretion to vary the arrangements in light of the levels of risk they perceive in particular blocks and taking account of their knowledge of the occupants.

- 4.2.26 It also makes clear that should there be any agreed changes to the policy the variations should be recorded in writing and filed on the KNH computer system.
- 4.2.27 Discussions with officers from KNH indicated that the key 'Responsible Persons' for inspecting and enforcing the policy covering the risk management of communal areas was the KNH Estate Management Officer (EMO) supported by the KNH Area Housing Manager.
- 4.2.28 During discussions with KNH Officers the Panel was informed that a key challenge facing KNH in implementing and enforcing the policy was the number of communal areas. The Panel was informed that KNH managed approximately 23,000 homes on behalf of Kirklees Council and that there were in excess of 800 communal areas located in buildings across the district of Kirklees.
- 4.2.29 KNH officers stated that there were a number of factors that made achieving consistency in the implementation of the policy difficult including: Buildings across Kirklees having varying layouts of communal areas; and the different circumstances and requirements of residents and the neighbourhood.
- 4.2.30 KNH officers stated that taking into account these factors and complications that it would have been much easier for KNH to implement and enforce a 'zero tolerance' approach.
- 4.2.31 Officers from KNH stated that it was the responsibility of the EMO to interpret the policy by taking into account their knowledge of the residents and the building and the specific circumstances of the case.
- 4.2.32 As a way of illustrating this approach the Panel was informed of an example where an EMO had taken into consideration the background and practices of certain residents who did not use footwear inside their property. After consultation with the residents the EMO agreed that shoe racks could be located in the communal areas provided they were placed in a safe place to avoid them becoming a potential trip hazard.
- 4.2.33 Discussions with KNH officers indicated that the greatest risk of fire was actually from the residents themselves and was partly linked to an individual's lifestyle. KNH officers stated that the policy was aimed at providing residents who took a responsible approach with the opportunity to make their communal areas more welcoming. However the policy was also designed to provide KNH with the option to enforce sterile areas in those buildings where it perceived an increased risk in terms of fire safety.
- 4.2.34 Discussions with some local KNH residents including representatives of the Kirklees Federation of Tenants and Residents Associations (KFTRA) Living In Flats Group indicated that there was some confusion regarding whether or not KNH had a policy covering personal items in communal areas.

- 4.2.35 The Panel was informed by one resident that they had received conflicting advice regarding the placement of door mats, with advice from an EMO stating that residents couldn't have mats outside their front doors while representatives from the local Fire Service had stated mats were allowed provided they were non-slip and securely fastened to the floor.
- 4.2.36 Some KNH residents stated that their local EMO had insisted that their block should be sterile despite the building being less than 3 storeys and the residents were unclear why this approach had been taken.
- 4.2.37 During the meeting with residents the Panel was made aware that some residents felt that there were inconsistencies in the approach being taken by KNH. The Panel was told of residents seeing examples of both furnished and sterile areas in similar blocks. The perception from some residents was that the outcome on whether or not a communal area could be furnished was dependant on how determined residents were in requesting permission to furnish.
- 4.2.38 The Panel was informed that letters had been sent to all residents living in low and high rise flats by KNH in October and November 2006 which covered guidance on the storage of personal items in the communal areas. The Panel noted that the guidance issued in 2006 has remained largely unchanged.
- 4.2.39 During the meeting with residents the Panel was given a copy of the guidance letter dated November 2006 issued to residents residing in blocks of 3 storey and above and residents stated that as far as they were aware this was the last guidance they had received and believed that there was no policy 'set in stone' for 2 storey blocks. The Panel has not been made aware of any other communication being sent since the original guidance was issued.
- 4.2.40 The Panel was informed by KNH officers that the policy covering communal areas had evolved. Officers stated that when the policy was first introduced the initial message to KNH frontline staff had been to start on the basis of making all communal areas sterile.
- 4.2.41 Officers indicated that over a period of time KNH had become more comfortable with the 'realities' of the policy and had started listening and working more with residents in order to introduce the 'managed use' approach when appropriate.
- 4.2.42 As part of the evidence gathering exercise panel members visited a number of blocks of flats across the district in order to observe first hand those issues relating to fire safety and cleaning in communal areas. Included on the list of observations was a check on what furnishings or displays were located in these areas.

4.2.43 The results of these visits highlighted that the majority of two storey blocks had introduced a 'managed use' approach with some personal items on display, this approach appeared to be less common in three storey blocks and evidence of personal items was seen in one multi storey block (above 3 storey). Details of these results are shown in the table below.

4.2.44

Type of Block	Blocks visited	Number of Blocks with Items in communal areas	%
Two Storey	16	9	56%
Three Storey	21	7	33%
Above three storey	5	1	20%



Example of a furnished communal area in a managed KNH Block

4.2.45 The WYFRS informed the Panel that Councils in the neighbouring districts of Bradford and Calderdale both operated a 'zero tolerance' approach. The WYFRS confirmed that the decision on how KNH treated the storage and display of personal items in the lower rise flats was entirely down to KNH and felt that Kirklees had been pragmatic in the approach it had taken with fire safety in communal areas.

4.2.46 One member of the Panel conducted a telephone survey to establish how neighbouring Councils dealt with fire safety in communal areas. The survey which covered Rotherham, Calderdale and Sheffield did appear to show that Calderdale had now changed its position with all three areas indicating that they took a managed approach in low rise blocks.

- 4.2.47 As part of this review the Panel also wished to consider the management of designated areas within communal areas particularly relating to the storage on rubbish bins.
- 4.2.48 Fire Safety guidance covering blocks of flats issued by the Local Government Group highlights the importance of the arrangements for the disposal of waste and refuse in order to prevent the build up and storage of combustible rubbish in communal areas.
- 4.2.49 The KNH document 'Overview of KNH Approach To Fire Safety For the Homes It Managers' includes a section covering housekeeping in communal areas in which it states that the responsibility for the management and removal of accumulated waste and /or obstructions is the responsibility of the Area Housing Manager and their Estate Management Officers.
- 4.2.50 KNH officers informed the Panel that KNH did not have a set procedure for dealing with situations where housekeeping in communal areas was felt to be unsatisfactory. The Panel was informed that KNH was considering ways to deal with this issue and the KNH Fire Safety Group was now looking to clarify a process that could be used by the KNH neighbourhood teams.
- 4.2.51 The Panel was informed by KNH that it accepted the responsibility for any items it placed in the communal areas such as mats. KNH officers stated that although KNH recognised that bin storage in communal areas increased the risk of fire it did not provide any further guidance covering bin storage as it could not realistically cover all circumstances.
- 4.2.52 KNH officers stated that the issue covering the storage of bins was complex and even if you took the approach of moving all bins to outside storage locations this would not necessarily reduce the risk of fire only relocate it and potentially increase the risk of arson.
- 4.2.53 KNH officers informed the Panel that despite the complexity of the issue, KNH had started to look at a programme to improve the storage of bins particularly as the vast majority of the Council owned properties had not been built to accommodate the introduction of wheelie bins.
- 4.2.54 KNH officers informed the Panel that KNH had clearly recognised that wheelie bins had become a potential fire safety hazard as they were easy to move and set fire to and funds had been identified in order to help improve the storage of bins.
- 4.2.55 During the discussions with KNH residents the Panel heard that residents who still had dustbins located in the inside of communal areas did have concerns regarding the risk of fire. Residents were particularly concerned of the potential dangers and health implications resulting from the fumes that would omit from a bin fire.

4.2.56 During their visits to blocks, panel members looked at the location of wheelie and rubbish bins to check that they were situated away from vulnerable areas such as doors and windows. The Panel found that out of a total of 42 flats visited only 1 block had bins located close to areas where there was a potential for fire spread to the building.

4.2.57

PANEL VIEW

- The Panel notes the approach taken by KNH to fire safety in communal areas and agrees with a 'managed use' approach to blocks of 3 storeys or less.
- The Panel believes that the risk management policy in communal areas as described in the document 'Overview of KNH Approach to Fire Safety For the Homes It Manages' is clear, however it is felt that allowing the 'Responsible Persons' to have discretion to vary the arrangements has led to confusion and inconsistencies with the implementation of the policy.
- The Panel acknowledges the challenges faced by KNH when taking into consideration the numbers of communal areas across Kirklees and the complexity of the many different circumstances that exists amongst residents and neighbourhoods.
- The Panel believes there is a need for KNH to effectively communicate the risk management policy covering communal areas as it appears there is still some uncertainty amongst some residents regarding the approach being taken by KNH.
- The Panel feels that the interpretation of the policy does appear to vary across neighbourhoods.
- The Panel acknowledges the role and the challenges that face the Estate Management Officers in implementing the policy and accept that in some cases there will be a requirement for the communal area to remain sterile.
- The Panel notes the work being done by KNH to improve the procedures for dealing with unsatisfactory housekeeping issues and would wish to see that this work is concluded at the earliest opportunity.
- The Panel supports the work that is being done by KNH to improve the storage of bins as part of the required fire safety measures and would wish to see that this programme continues as part of the ongoing improvement to residents' facilities

4.2.58

AREA OF FOCUS ONE - RECOMMENDATIONS

4.2.59

1. That measures are taken to improve the consistency and communication of the risk management policy in communal areas, this should include:

- Developing an action plan detailing steps that can be taken to improve the communication to relevant residents covering the fire risk management approach to communal areas.
- Making clear as part of the communication that KNH will discuss requests to furnish communal areas (within the parameters of the guidance) and that each request will be individually assessed to take account of the specific circumstances of the case.
- Ensuring that all requests include the input of both the local Estate Management Officer and the Area Housing Manager and following consultation with the residents that the final decision is recorded and communicated by way of a letter to residents that clearly states the reasons for the decision.
- Amending the policy to provide greater clarity on the criteria for allowing a variation of the policy and the scope of changes that could be made.

4.3

Area of Focus 2

To review the policy and procedures followed by KNH to undertake its responsibility in adhering to the current fire and safety regulations that apply to communal areas

4.3.1 Background

4.3.2 The FSO 2005 moves the responsibility of fire safety certification away from the Fire Service and seeks to ensure that the landlord or business actively pursue and maintain fire safety and take responsibility for staff and others who visit or live in their premises.

4.3.3 The FSO 2005 does not apply to individual flats, but does apply to the communal areas of block of flats. It also applies to the workplaces within a block of flats for example a room used by a caretaker.

- 4.3.4 The FSO 2005 also includes certain requirements and duties of the 'responsible person' and in the case of a block of flats the responsible person is the person that controls the premises and includes anyone who, "under a tenancy or contract, has a responsibility for maintenance or repair of the premises, maintenance or repair of anything in or on the premises, or for the safety of the premises".
- 4.3.5 The FSO 2005 imposes a general duty of fire safety care in respect of 'relevant persons' (this includes anyone who lawfully works or resides in the premises). This means that the responsible person must put in place fire safety measures that, so far as is reasonably practicable, ensure that the premises and individuals are safe.
- 4.3.6 The responsible person must identify, remove or minimise any hazards through undertaking a 'fire assessment'. The fire risk assessment must be 'suitable and sufficient' to ensure that the general duty of fire safety care is satisfied within the communal areas.
- 4.3.7 For organisations that control or manage the premises and employ 5 or more employees all main findings of the fire risk assessment must be documented and the fire safety arrangements must be recorded. This is part of the requirement to have in place arrangements for the "effective planning organisation, control, monitoring and review of preventative and protective measures".
- 4.3.8 The FSO 2005 is normally enforced by the fire and rescue authority, who will carry out inspections to check on the compliance with the order. If the Fire and Rescue Service identify a breach of the order they will notify the responsible person and may issue an enforcement notice requiring that steps are taken to remedy the breach. In those cases of serious risk a prohibition notice, prohibiting or restricting the use of premises, can be issued.
- 4.3.9 Fire Safety in KNH
- 4.3.10 A report that was issued to the KNH Strategy Committee (August 2010) states that KNH takes fire safety management extremely seriously. The report also highlights that KNH has an excellent working relationship with the West Yorkshire Fire and Rescue Service (WYFRS).
- 4.3.11 This strong working relationship is recognised by a Fire Protection Concordat which is an agreement between the WYFRS and Kirklees Council in which KNH is a partner. The Concordat is intended to provide a framework to ensure that the roles and responsibilities of the partners are supported by practical working arrangements.
- 4.3.12 The Concordat includes a commitment that the partners will work together to ensure that the legislation is complied with and states that the WYFRS will

not take any formal enforcement action for any fire safety measures agreed as 'working towards' in the agreed action plan.

- 4.3.13 The Concordat includes a number of protocols that cover a number of Council areas including KNH. The protocol for KNH is detailed in a 3 year (2009-2012) Fire Safety Strategy that states a number of aims including:
- To focus on locally identified needs and target appropriate resources to deliver safer Kirklees Neighbourhood Housing premises.
 - To assess active and passive fire safety needs and grade them in priority order for the completion of work in accordance with its priority.
 - To demonstrate to all stakeholders our pro-active and dedicated fire safety arrangements.
- 4.3.14 Persons Responsible for Fire safety
- 4.3.15 The Fire Protection Concordat and the KNH document 'Overview of KNH Approach to Fire Safety for The Homes It Manages' details the key persons that are responsible for fire safety.
- 4.3.16 For the purposes of the FSO 2005 the Chief Executive of Kirklees Neighbourhood Housing is responsible for the management of fire safety in Kirklees Council owned residential properties and the day to day responsibility is delegated to Area Housing Managers.
- 4.3.17 During discussions with KNH officers, representatives of the Building Control Fire Safety Team and the WYFRS, the Panel was informed that KNH had a number of other persons across the organisation that were 'responsible' for fire safety that included anyone who had some working involvement in the premises.
- 4.3.18 During discussions with KNH officers, representatives of the Kirklees Council Building Control Fire Safety Team and the WYFRS, the Panel questioned whether KNH considered the role of residents in having some responsibility for fire safety. KNH officers stated that if residents undertook some of the day to day management of buildings then it would also consider residents as having some level of responsibility.
- 4.3.19 KNH has recognised that Area Housing Managers are not specialists in fire safety and prevention and so KNH has commissioned Kirklees Building Control to undertake the fire risk assessments. The support provided by a Building Control Fire Safety Team includes adequately trained specialist fire safety officers, building surveyors and a qualified engineer.
- 4.3.20 During discussions with KNH officers, representatives of the Building Control Fire Safety Team and the WYFRS, the Panel was informed that the fire risk assessments had been carried out for every appropriate building. KNH

officers stated that although there wasn't a requirement to undertake regular fire assessment updates KNH had introduced a clear process to ensure that checks were being carried out at appropriate times. This included a new assessment :

- Following significant alterations being made to a building.
- A minimum of every 3 years for low rise blocks.
- Annually for high rise blocks.

- 4.3.21 The Panel was provided with copies of a number of documents that detailed the fire risk assessments/surveys that had been undertaken by officers from the Building Control Fire Safety Team. The Panel noted that the documents comprehensively covered the key areas of risk and included details of: findings or failures; the potential outcome and risks; control measures to prevent failure; and timescale.
- 4.3.22 The Panel was informed that KNH kept records of the fire risk inspections by scanning them onto a computer system. However the information wasn't scanned into one location and it was difficult to extract and provide any meaningful data or statistical evidence. KNH officers stated that this was an issue that they were still investigating.
- 4.3.23 KNH officers informed the Panel that in addition to carrying out the fire risk assessments which were part of the regulatory requirements, KNH also commissioned regular inspections of communal areas. The inspections were carried out by two KNH building surveyors who visited premises every 3 – 6 months in order to record what they saw in communal areas and to check on the general condition of the building and identify damage.
- 4.3.24 KNH officers stated that KNH considered anyone who worked or lived in the buildings to have a responsibility to consider the safety of the premises and this included cleaners as well as KNH staff. KNH officers stated that they were happy to receive feedback from anyone who identified a potential fire risk in a building and they were committed to dealing with any issues raised.
- 4.3.25 The Panel was informed that the communal cleaning service operated by Kirklees Cleaning Services often provided valuable feedback to KNH by reporting issues such as damage, vandalism, rubbish etc. which helped to identify areas of risk particularly those relating to fire safety.
- 4.3.26 KNH officers stated that there were examples of good working relationships between KNH front line staff and the cleaners and KNH felt that it would be useful to consider formalising these arrangements rather than having to rely on examples of good practice.
- 4.3.27 KNH officers informed the Panel that KNH accepted that it had a responsibility to ensure that front line staff were provided with adequate training and that there was sufficient support and advice available to them through specialist fire safety officers.

- 4.3.28 The Panel was informed that KNH had undertaken a number of training programmes during the last few years that had included:
- “Fire Safety in Communal Blocks” (March 2010) - attended by all Estate Management Officers and a selected group of Building Surveyors.
 - “Fire Safety Awareness”(September 2010) – attended by scheme Co-ordinators (Supported Housing)
 - “Fire Safety for Office Fire Wardens and Marshals” – attended by staff who hold positions in KNH occupied offices and buildings.
- 4.3.29 The KNH document that covers the approach to fire safety includes a commitment from KNH that general training for all staff and specific training for responsible persons and competent persons carrying out inspections, checks and tests on behalf of the responsible person will be provided at least once every 3 years. In addition Area Housing Managers and the managers of KNH surveyors are responsible for ensuring new staff receive adequate training to ensure they are competent to carry out their duties.
- 4.3.30 KNH officers informed the Panel that KNH had established a Fire Safety Group that had the responsibility of helping to set the policy and procedures covering fire safety and to monitor that the work being carried out to fulfil the legislative requirements of the FSO 2005.
- 4.3.31 The membership of the Fire Safety Group consists of a number of KNH officers who meet every month to discuss issues relating to fire safety. The group also meets once a quarter with representatives from the Kirklees Building Control Fire Safety Team and provide regular updates to the KNH Heads of Service Team.
- 4.3.32 KNH Fire Safety Document
- 4.3.33 As stated in section 4.2 of this report, in August 2010 the KNH Strategy Committee was asked to approve the KNH policy on fire safety that was covered in the document “Overview of KNH Approach to Fire Safety For the Homes It Manages”.
- 4.3.34 The KNH Strategy Committee was also asked to approve a recommendation that KNH seek support for the policy from Kirklees Council’s Cabinet before communicating it to all stakeholders.
- 4.3.35 During discussions with KNH officers the Panel was informed that the KNH Strategy Committee had approved the KNH policy on fire safety although the decision was also taken that it would not be necessary to seek support from Kirklees Council’s Cabinet unless there were any significant changes to the approach to fire safety.
- 4.3.36 The Panel was informed that the entire KNH policy covering fire safety was included in the document “Overview of KNH Approach to Fire Safety For the Homes It Manages”. The policy had been developed by the Fire Safety

Group in conjunction with the Building Control Fire Safety Team and had included consultation with the WYFRS.

- 4.3.37 During a review of the fire safety document the Panel noted that the document did not include evidence that the document had been signed off and adopted by KNH.
- 4.3.38 The fire safety document confirms that the day to day responsibility of managing the policy has been delegated to the Area Housing Managers who are supported through a framework that details tasks that can be carried out by the competent specialist fire safety officers, building surveyors and other KNH staff.
- 4.3.39 The fire safety document includes a mixture of policy and procedure and covers a number of areas relating to fire safety checks and includes:
- Fire Protection Systems.
 - Risk management in Communal Areas of Blocks.
 - Testing of Alarms
 - Fires, Faults and False Alarms
 - Fire Safety Awareness Training
- 4.3.40 In response to uncertainty from residents and KNH Staff regarding what to do in the event of a fire KNH has issued a “Fire safety – Evacuation Advice For Residents” that covers a number of circumstances and aims to provide much clearer guidance for residents.
- 4.3.41 Panel Inspections
- 4.3.42 As stated in section 4.2 panel members visited a number of blocks of flats across Kirklees in order to observe those issues relating to fire safety and cleaning in communal areas. Panel members used a fire safety checklist modelled on the Regulatory Reform (Fire Safety) Order 2005 checklist used by KNH.
- 4.3.43 The Panel focused on a number of areas of fire safety including:
- Checking on the statutory obligation to remind residents that the law on smoking applies to the communal areas.
 - Looking at evidence of smoking in the communal areas.
 - Checking on signage including fire evacuation/emergency procedures.
 - Checking whether the internal fire doors are operational and closed.
 - Checking whether the entrance door locks and security systems were working.
- 4.3.44 The results of the inspections relating to the areas of fire safety as detailed above highlighted the following:
- Despite the majority of blocks (79%) having non smoking signs clearly displayed panel members discovered evidence of smoking in nearly half (48%) of the flats visited.



Example of cigarette ends found on the floor of a communal area

- A significant number of blocks (74%) did not have fire –safety signs.
- The vast majority (88%) of internal fire doors were operational and closed.
- A third (33%) of all entrance door locks/security systems were not working correctly.

Details of these results are shown in the table below and a summary of the results of all aspects of the fire safety inspection are shown in appendices 1A – 1C

4.3.45

Blocks Visited	Number of blocks displaying non smoking signs	%
42	33	79%
	Number of blocks showing evidence that smoking has taken place	
	20	48%
	Number of blocks displaying fire safety signs	
	11	26%
	Numbers of blocks where internal fire doors were operational and closed	
	37	88%
	Numbers of blocks where door locks/security systems were not working	
14	33%	

PANEL VIEW

- The Panel acknowledges the strong working relationship that appears to have developed between KNH and the WYFRS and would wish to see both partners continue to develop this relationship.
- The Panel supports the aims that are included in the KNH protocol and feels that KNH should ensure that it maintains a focus on these core objectives as part of the continuing work on fire safety.
- The Panel notes the wide variety of individuals that can be deemed to be classed as a responsible person under the requirements of the FSO 2005 and would wish to see KNH provide further clarity in this area.
- The Panel supports the view from KNH that residents have a role to play in fire safety and would wish to see that this role is recognised by KNH including formalising responses to issues raised.
- The Panel notes the difficulties that KNH currently experience in extracting details relating to fire risk inspections and other reports detailing potential areas of fire risk and would wish to see this issue resolved as soon as possible.
- The Panel recognises the good practice being followed by the Kirklees Cleaning Service in reporting issues relating to fire safety and supports the idea of formalising these arrangements.
- The Panel feels that the look and appearance of the KNH document “Overview of KNH Approach to Fire Safety For the Homes It Manages” does not sufficiently reflect that of an adopted policy and feels that it would be beneficial to produce a more formal document that represents the fire safety policy of KNH.
- The Panel welcomes the fire safety evacuation advice that has been issued to residents and staff and would wish to see that KNH continue to promote this advice on a regular basis.
- The Panel believes that the Panel inspections appear to have highlighted a number of concerns in areas of fire safety in particular the evidence of smoking in non smoking areas and what seems to be an inconsistency in the use of fire safety signage.
- The Panel would wish to see KNH undertake further fire safety audits of buildings and consider introducing measures aimed at resolving the issues highlighted above.

AREA OF FOCUS TWO - RECOMMENDATIONS

1. That Kirklees Neighbourhood Housing (KNH) review and amend the document 'Overview of KNH Approach to Fire safety For the Homes It Manages' with the aim of re-launching it as the formal KNH policy covering fire safety. The revised document should include:

- A document that is dated and has a title that clearly states it is the KNH Fire Safety Policy and includes a policy review statement.
- The inclusion of a formal sign off by the Chief Executive of KNH as the person who has overall responsibility for the management of fire safety.
- A greater emphasis on the fire safety policies (the rules/the intent) rather than the procedures (the implementation of policy).
- The inclusion of a matrix that identifies the key positions within KNH and externally (such as the Building Control Fire Safety Team) that can be considered as having responsibility for fire safety including a brief overview of roles and responsibilities.

2. That KNH explores ways in which it can include the role of residents and the Kirklees Cleaning Service (KCS) in fire safety. This could include:

- Developing a framework to establish formal fire safety reporting and working arrangements between KCS and KNH.
- Considering how KNH recognises the role of residents including: reviewing the feasibility of the introduction of clear resident guidelines; promoting examples of good practice; formalising reporting arrangements; and reporting on the resolution of issues raised.

3. That KNH uses its ongoing fire safety audits to focus on reviewing the areas highlighted by the Panel's inspections with a priority on the issues relating to the consistency of fire safety signage; the extent by which residents are not adhering to the law that prohibits smoking in communal areas; and the condition of entrance locks and security systems. The results of these audits should be recorded and include details of the findings and proposed measures to deal with any identified risks or failings.

4.4

Area of Focus 3

To review the policy and procedures for cleaning communal areas including the process that is followed in awarding cleaning contracts and monitoring the standards of cleaning.

4.4.1 Communal Areas

4.4.2 Communal areas are those areas of a house or a block of flats or an estate that residents have a right to use in common with other tenants and for which the landlord is responsible. Typical examples of communal areas in a block of flats include shared: entrance halls and foyers; stairwells; landings; and corridors.

4.4.3 The law imposes requirements on landlords to keep certain parts of properties and certain services in repair and proper working order. These requirements mainly apply to repairing the structure and exterior of the property and also for any systems that supply water, gas and electricity.

4.4.4 In addition, landlords should ensure that shared stairs, lifts, rubbish chutes and lighting to shared areas are properly maintained. Tenants have a responsibility to keep all entrances, passageways, communal halls and stairs clean and free from obstruction.

4.4.5 The KNH New Tenancy Agreement includes a section that covers flats, maisonettes and shared areas in which one of the clauses states *“You must share responsibility with your neighbours for cleaning any shared corridors, stairs, landings or entrance halls.”*

4.4.6 Background to KNH Cleaning of Communal Areas

4.4.7 During discussions with KNH residents including representatives of the Living In Flats Group, the Panel was informed that the issue covering the cleaning of communal areas had been a subject of discussion between residents and KNH for many years.

4.4.8 Documentary evidence supplied by the Living in Flats Group showed that as far back as 2004 Kirklees Federation of Tenants & Residents Associations (KFTRA) had been made aware of concerns about the poor state of some of the communal areas in low and medium rise blocks of flats.

4.4.9 An extract from the residents’ magazine “Hometruths” produced by KFTRA in March 2004 stated that the majority of residents living in low and medium rise flats cleaned and maintained the communal areas themselves and in most cases this was done to a satisfactory standard.

- 4.4.10 The Hometruths article highlighted that some elderly and disabled residents were unable to clean and a small minority of residents were unwilling to clean. In addition the article reported that in some cases the blocks of flats were in such poor decorative state that no amount of cleaning would bring them up to an acceptable standard.
- 4.4.11 The Hometruths article also reported that residents who lived in high rise blocks (3 storeys and above) paid a service charge that covered the costs of having their communal areas cleaned on a regular basis.
- 4.4.12 During discussions with KNH Officers and representatives from Kirklees Cleaning Services (KCS) the Panel was informed that the introduction of a Communal Cleaning Service had originally been considered following an improvement of works that had been carried out in a number of communal areas during 2004/2005 which had included new flooring, painting and lighting.
- 4.4.13 The Panel was informed that KNH wished to explore ways of maintaining a consistent standard of cleanliness and to protect the investment it had made in the upgraded communal areas. Following feedback from a number of estate inspections in 2004, KNH agreed to run a six month pilot scheme in a number of flats in the Batley and Spen areas.
- 4.4.14 In November 2005 a report was presented to the KNH Finance and Performance sub-committee reporting on the results of the communal cleaning survey in the pilot areas. The report stated that the results of the survey were inconclusive and a further survey of the pilot areas and a new survey covering the rest of the low and medium rise flats in these areas had been commissioned.
- 4.4.15 The report included the results of the additional surveys which indicated that the majority of respondents were against the introduction of a cleaning service. The report recommended that the cleaning service should not be introduced and that the service in the pilot areas should be withdrawn.
- 4.4.16 Documentary evidence supplied by the Living in Flats Group showed that in June 2007 KNH reconsidered the introduction of communal cleaning. A briefing note from KNH dated 26 June 2007 stated the key reasons for re-considering was:
- Improvement of the communal areas was part of the move towards 'decent communities'.
 - To protect the investment in the new floor coverings.
 - To enhance the ability to let flats in the blocks which were not being looked after.
 - To enhance the environment for people living in poorly cleaned blocks.
- 4.4.17 In November 2007 a report from KNH to the Batley and Spen Tenant Committee sought support from the committee on the introduction of a

chargeable communal cleaning service in those blocks that had been upgraded and were not being cleaned by residents to a satisfactory standard.

- 4.4.18 The report stated that the next steps in developing a communal cleaning contract was to agree a standard cleaning specification, continue consulting with the KFTRA Living in Flats Group and to report to Kirklees Council with indicative costs and to seek formal approval to tender for the service.
- 4.4.19 In March 2008 KNH presented a report to Kirklees Cabinet which requested approval to proceed with the introduction of a communal cleaning service in low and medium rise blocks of flats. The report confirmed that the service would be provided by KCS based on a charge of £1.75 per week per household.
- 4.4.20 The Cabinet report stated that in the first instance KNH would inform residents of their responsibility to maintain the cleanliness of communal areas and where this wasn't being done KNH would look to introduce the cleaning service and charge the residents for the work.
- 4.4.21 The Cabinet report stated that area office staff had made an interim assessment of which blocks had been identified as being in need of the cleaning service. The cleaning service would only be introduced following a strict consultation process that included:
- Providing residents with an initial 4 week period to meet a minimum standard of cleanliness followed by an inspection to include representatives from KFTRA to assess the standard of cleaning.
 - Where the cleaning service was to be introduced a statutory notice would be issued giving residents 4 weeks notice before the cleaning service and charge started.
- 4.4.22 The Cabinet report also stated that residents could appeal against the decision to introduce the service through the KNH complaints procedure which included a final stage adjudication panel comprising of three members of the KNH Board.
- 4.4.23 The Cabinet report stated that the proposed cleaning service would be for the communal areas only and highlighted the benefit of the service for those tenants who were no longer able to clean the areas outside their flats. The report also confirmed that the cleaning charge would be eligible for Housing Benefit.
- 4.4.24 The Cleaning Service Level Agreement
- 4.4.25 In 2008 KNH and KCS introduced a Service Level Agreement (SLA) that outlined the standards and specification for cleaning communal areas. The agreement lists the flats in the Dewsbury and Batley Area of Kirklees that would form part of this agreement.

- 4.4.26 The agreement was initially effective for the period November 2008 to October 2011 with an option to extend the agreement for a further two years. The Panel understand that the option has been taken up and the agreement remains valid. The Agreement covers a number of areas that include:
- The Cleaning Specification.
 - Frequency of cleaning.
 - Exceptions to the cleaning contract.
 - Performance Management and frequency of review meetings.
 - The costs of providing the service.
- 4.4.27 A report sent to Cabinet in March 2008 stated that details of the agreed cleaning specification would be distributed to all recipients of the service. In addition residents were to be issued with slips following the cleaning of a block allowing residents the opportunity to assess the standard of cleaning.
- 4.4.28 The SLA section on performance management includes a clear directive that at least three communal areas will be assessed each week and any areas that are found to be below standard will be revisited and cleaned within 48 hours.
- 4.4.29 The SLA also includes a section outlining the procedures that will be followed as part of the review of the service. This includes:
- Quarterly meetings between KNH and KCS to discuss operational issues.
 - Random audits to be undertaken by KNH.
 - An annual review of costs and cleaning arrangements.
- 4.4.30 Cleaning Services Provided by KCS
- 4.4.31 During discussions with KNH officers and representatives from KCS the Panel was informed that there were a number of cleaning contracts currently operating across Kirklees.
- 4.4.32 KCS stated that it had been commissioned to undertake a number of different cleaning contracts over the years although the cleaning operations had been predominately focused in the South of Kirklees. The cleaning services that were being provided were ad hoc and included services that operated on a variety of hours and requirements. Many of the current services were being provided by individual cleaners allocated to specific buildings with their own procedures and schedules.
- 4.4.33 KCS stated that the communal cleaning contract had been originally set up to cover blocks of flats located in the North of Kirklees but the service had evolved over the years and KCS in conjunction with KNH were now looking to expand the service into South Kirklees.
- 4.4.34 KCS stated that as part of the communal cleaning SLA it monitored carefully the standard of cleaning that was taking place although it did concede that

checking the standard was difficult due to the subjective nature of the work and depending at what stage of the cleaning cycle the work was inspected.

- 4.4.35 KCS provided the Panel with the details of the communal cleaning work schedules which listed the blocks and the areas that were covered and confirmed that each block included in the schedule was cleaned once every two weeks.
- 4.4.36 During the discussions with KNH and KCS the Panel was informed that KNH imposed a standard charge for all residents that received the communal cleaning service. This charge would differ from the individual contracts which had been tailored to meet the requirements of a specific building.
- 4.4.37 KCS informed that Panel that it used a basic formula to calculate the costs of providing the communal cleaning service which included taking account of the costs of travelling; labour; materials; vehicle; and assumptions on the time it would spend on each block.
- 4.4.38 KNH informed the Panel that it was aware that residents' reaction to the introduction of the cleaning service did vary. There had been cases where residents who had the charge paid for by housing benefit took a different view and attitude to the introduction of a cleaning service to those residents living in the same block that would have to pay the charge out of their own income.
- 4.4.39 KNH stated that it had taken into consideration the situation facing residents that had to pay for the charge and one of the reasons behind commissioning the communal cleaning schedules to operate fortnightly was to keep the costs down.
- 4.4.40 The Panel was informed by KNH and KCS that they recognised that the time spent cleaning each block would vary depending on the size and layout of the building and would result in some larger blocks having a disproportionate amount of time being spent on it when compared to others. However KCS stated that the aim of the service was to maintain a consistent standard of cleaning across all blocks.
- 4.4.41 KNH informed the Panel that the cleaning service would only be introduced following a consultation led by the local Estate Management Officer. KNH stated that at any point during the consultation process residents had the option to club together and commission their own independent cleaners to carry out the cleaning.
- 4.4.42 The Panel was also informed that there was an option for blocks to opt out of the communal cleaning service provided the residents agreed to maintain the required standard of cleanliness. This could be done by residents cleaning the areas themselves or by making arrangements with independent cleaners.

- 4.4.43 During the discussions with KNH and KCS the Panel was informed that before a block could be included in the communal cleaning service KCS needed to assess the feasibility of introducing a new block into the work schedule.
- 4.4.44 The Panel was informed that to ensure that the introduction of a new block was cost effective KCS would wait until a number of blocks within the area were to be included. This approach did occasionally lead to delays in some blocks receiving the service straight away and the Panel was informed that no specific guarantee could be given on the time it would take to introduce the cleaning service.
- 4.4.45 KCS informed the Panel that the communal cleaning service was undertaken by 6 part time cleaners who worked in pairs covering the areas of Batley, Dewsbury and Huddersfield. The time for each cleaning schedule started at the first address and continued until the shift was completed with the time for travelling included in the costs negotiated as part of the SLA. The cleaners operated from a van and followed a designated cleaning schedule. The vans included supplies of water which when mixed with the correct cleaning fluids enabled the cleaners to use hot or cold water to clean effectively.
- 4.4.46 The Panel was informed that the cleaners were instructed to put leaflets through residents' doors to inform them that cleaning had been carried out. The leaflet had been designed to warn residents that the floors could be wet rather than be used as a document inviting comments on the standard of the work.
- 4.4.47 The Panel was informed that complaints from residents were dealt with by each Estate Management Officer who would e-mail KCS details of the issue. KCS stated that as stipulated in the SLA it would respond to each complaint within 24 hours of receipt.
- 4.4.48 The Panel was informed that KNH did not retain a central record of complaints relating to cleaning service as each complaint was dealt with locally through the Estate Management Officer.
- 4.4.49 Discussions with some local KNH residents including representatives of the Living in Flats Group highlighted confusion amongst some residents who were unclear why they were being charged different rates for their cleaning service. In addition some residents indicated that they did not understand why cleaners spent less time cleaning their blocks compared to other similar blocks located nearby.
- 4.4.50 Discussions with some local KNH residents highlighted to the Panel that there appeared to be a perception that the cleaning service was not value for money. One resident had calculated that in her block residents were paying a total of £31.52 a month and stated that the cleaners were spending no more than an hour a month on cleaning the communal areas.

4.4.51 One resident informed the Panel that after new flooring had been laid KNH had immediately informed residents that it planned to introduce the communal cleaning service. The resident informed the Panel that despite meaning she would have to pay the charge she did not feel that she could vote against the cleaning service as KNH had stated that the majority of residents would not be affected because the charge would be covered through the housing benefit.

4.4.52 During the discussions with some local KNH residents the Panel was made aware that some residents were unclear on the standards of cleaning that had been agreed between KNH and KCS meaning that some residents had no means of assessing whether the cleaning had been carried out to an acceptable standard within the terms of the agreement.

4.4.53 Discussions with some local KNH residents highlighted that some residents were not aware that KNH offered residents the options to opt out of the communal cleaning service provided the standard of cleanliness could be maintained. Although the Panel did highlight the difficulties of opting out particularly as it required the agreement from all residents in the block and would be of no advantage to those residents who received housing benefit.

4.4.54 Panel Inspections

4.4.55 As stated early in the report panel members visited a number of blocks across Kirklees in order to observe those issues relating to fire safety and cleaning in communal areas

4.4.56 The Panel focused on a number of areas relating to communal cleaning including assessing the cleanliness and condition of:

- The Foyer
- The Staircases
- The landings
- The Entrance Doors

4.4.57 The inspections included visiting blocks where the communal areas were maintained through the KNH administered communal cleaning service as well as those where the tenants remained responsible for the cleaning. It should be noted that the 5 multi storey blocks that receive a bespoke cleaning service provided by KCS are not included in the analysis below.

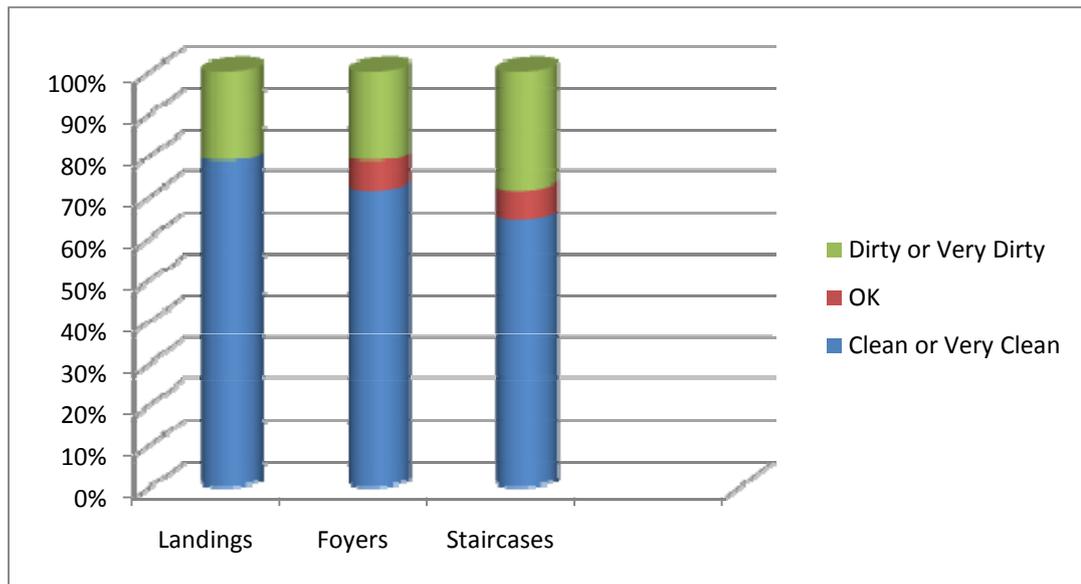
4.4.58 The results of these inspections highlighted the following:

- Blocks that received the cleaning service showed high levels of cleanliness in many areas including 11 out of 14 (79%) of Landings; 10 out of 14 (71%) of Foyers; and 9 out of 14 (64%) staircases being assessed as either clean or very clean (see chart in section 4.4.59).
- Areas that scored least included entrance doors included 5 out of 14 (36%); and internal windows (within safe reach) 4 out of 14 (29%) being assessed as either dirty or very dirty.

- Blocks where residents had the responsibility for cleaning generally showed relatively low standards of cleaning with the following areas being assessed as being either dirty or very dirty: high level internal windows 15 out of 23 (65%) ; Internal windows (within safe reach) 14 out of 23; Foyers and entrance doors 13 out of 23 (57%). (see chart on section 4.4.60)

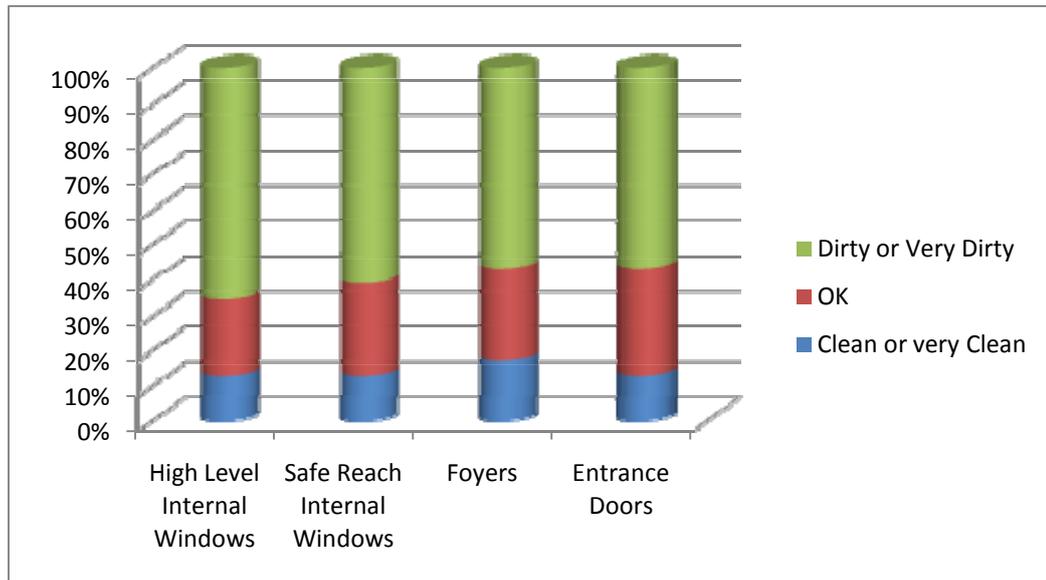
A summary detailing the results of all aspects of the cleaning inspection are shown in appendix 2.

4.4.59 The chart below illustrates the assessment from the Panel inspections of certain parts of communal areas in blocks that received the cleaning service.



Communal areas in blocks that receive the communal cleaning service

4.4.60 The chart below illustrates the assessment from the Panel inspections of certain parts of communal areas in blocks cleaned by residents



Communal areas in blocks cleaned by residents

4.4.61 During the inspections some panel members noted that there were areas of the district which had clusters of blocks that were in a particularly poor decorative state. The communal areas in these blocks were generally dirty, in poor condition and in some cases there were blocks with exposed electrical wires and security entrances not working.



Example of a particularly dirty communal area.

4.4.62 In these cases the Panel has concluded that the approach to enforce the cleaning service into blocks that do not maintain a required standard of cleanliness is not being implemented across all areas of Kirklees.

4.4.63

PANEL VIEW

- The Panel notes that with the exception of a short clause included in the KNH New Tenancy Agreement there is no specific policy or document that details the responsibilities that the resident has regarding the standard of cleanliness in the shared communal areas.
- The Panel acknowledges that many residents are happy to continue with the responsibility of cleaning their own communal areas and would wish to see that KNH continue to encourage and support residents to maintain their shared areas to an acceptable standard of cleanliness.
- The Panel accepts that in some cases there will be a need for KNH to impose the communal cleaning service and would wish to ensure that KNH continues to follow a strict consultation process which should include providing residents with clear guidelines on what options are available to them.
- The Panel notes that there are a number of historical cleaning contracts that has led to a variety of different contracts, charges and standards being introduced and the Panel feels that this has led to confusion amongst some residents.
- The Panel acknowledges the difficulties facing KNH when introducing the cleaning service to those blocks that include recipients of Housing Benefit.
- The Panel acknowledges that the time spent on cleaning individual blocks will vary depending on the size and layout of the building and note the aims of KCS to provide a consistent standard of cleaning across all blocks.
- The Panel notes that KCS assess the cost effectiveness of cleaning a new block before including it as part of the communal cleaning service and that this approach can lead to delays in some blocks receiving the service.
- The Panel wishes to see residents being given a greater opportunity to comment on the standard of cleaning being provided by KCS.
- The Panel notes that KNH does not keep a central record of complaints relating to the cleaning service and would wish to see steps are taken to formally capture complaints and for details of any resulting actions to be issued to residents.

PANEL VIEW cont'd

- The Panel notes that some residents are unclear on the standards of cleaning that have been agreed between KNH and KCS and would wish to see that this is more effectively communicated to residents.
- The Panel notes that based on the inspections it made to those blocks included in the cleaning service that KCS appears to be maintaining a reasonable standard of cleaning.
- The Panel has concerns that based on the evidence seen in those clusters of blocks that were in a poor decorative state and low standards of cleanliness that KNH does not appear to be consistently following the approach to enforce the cleaning service into blocks that do not maintain the required standard of cleanliness.

4.4.64

AREA OF FOCUS THREE - RECOMMENDATIONS

1. That steps are taken to improve the communication to residents relating to their responsibilities covering the cleanliness of communal areas; the processes that are followed where the communal cleaning service is to be introduced; and the standards of the service. This should include:

- Producing a policy or document that includes:
 - The residents' responsibilities in maintaining communal areas including clear guidelines on the minimum standards of cleanliness and highlighting the implications if the required standards are not met.
 - An explanation of the consultation process that is followed when proposing the introduction of the communal cleaning service including details of options available to residents.
 - Details of the communal cleaning specification.
- Developing an action plan detailing methods that can be taken to help ensure that the above information is effectively communicated to all existing and new residents.

2. That KNH in conjunction with KCS investigate ways of speeding up the time it takes to introduce a new block to the communal cleaning service. This should be done in consultation with relevant stakeholders such as the Living in Flats Group.

RECOMMENDATIONS (cont'd)

3. That the following actions be taken to enable residents a greater opportunity to comment on the standards of cleaning and provide a more robust monitoring process:

- That KNH explore ways of involving residents in the monitoring of standards which could include developing a feedback sheet that will enable and encourage residents to comment on the service.
- Reviewing the processes followed in dealing with cleaning complaints including developing a system to centrally record complaints in order to help identify common issues or specific areas of concern and formalising feedback to residents on any agreed actions.

4. That KNH explore methods, such as the introduction of a star rating system, that can be used to help encourage and support both tenants who undertake their own cleaning and the service provided by KCS to achieve a consistently high standard of cleanliness.

4.5

Area of Focus 4

Assessing how issues relating to communal areas impact on elderly, disabled and vulnerable tenants.

4.5.1 Background and approach taken by the Panel

4.5.2 Landlords have both a legal and social responsibility to ensure the wellbeing of elderly, disabled and vulnerable residents. This includes ensuring that there is no discrimination shown in the services provided to these groups and that consideration is given to their requirements to enable residents to live in a safe, warm, accessible and secure environment.

4.5.3 During this review the Panel took into consideration the needs of the elderly, disabled and vulnerable residents in all of the work that was carried out and believe that the recommendations covered in this report are relevant and applicable to all residents and importantly benefit everyone.

4.5.4 The Panel has detailed below specific issues relevant to elderly, disabled and vulnerable tenants that were highlighted and covered as part of this review.

4.5.5 Fire Safety

4.5.6 The document 'Overview of KNH Approach to Fire Safety For The Homes It Manages' includes a section covering Fire Protection Systems and Equipment and includes a specific reference to sheltered homes. This section states that

sheltered houses have special corridor fire doors that are easier for older people or those with mobility problems to open and which will close automatically in the event of an alarm sounding.

- 4.5.7 The document also covers the approach taken for supporting 'Highly Vulnerable Tenants'. It states that KNH work with the Council's Adult Services to install fire alarms linked to care phones and visible vibrating alarms for deaf people. In addition KNH has installed a number of semi-permanent low pressure sprinkler systems in the homes of tenants that KNH has identified as being at high risk of having a fire.
- 4.5.8 During discussions with KNH officers the Panel noted that the only buildings that had alarm detection systems in communal areas were blocks of 6 storeys or higher and sheltered housing.
- 4.5.9 KNH officers informed the Panel that the communal areas were generally very safe environments. KNH stated that the new flooring being installed was fire retardant and it used special fire retardant paint on the walls and ceiling. In addition KNH had fitted fire resistant front doors in all flats situated above a communal area.
- 4.5.10 The Panel was informed that KNH considered the circumstances of residents living in the block when assessing the furnishing of communal areas. KNH officers indicated that if it was felt that allowing a managed approach to a communal area could be a risk to tenants, particularly the elderly, disabled or vulnerable, it would not hesitate to enforce a sterile area.
- 4.5.11 KNH officers stated that it was committed to developing a risk based approach towards supporting individuals. This would ensure that those individuals that had complex needs could be properly assessed and provided with adequate and appropriate support.
- 4.5.12 The KNH evacuation advice for residents states that residents will need to make special arrangements for anyone that requires an assisted escape. A representative from the WYFRS informed the Panel that the assessment of those individuals who required assistance would be covered under the KNH evacuation policy which would result in an individual having their own personal evacuation plan.
- 4.5.13 The Mobility Scooter Policy
- 4.5.14 In December 2011 KNH introduced the Mobility Scooter Policy which states that the key objective of the policy is to keep tenants and residents safe and to set out the procedures and guidelines for the storage and charging of electric mobility scooters within properties with a shared of communal area.
- 4.5.15 The policy covers a number of areas including:
- The aim of the policy.

- Storage of Electric Mobility Scooters in communal areas.
- Charging of scooters.
- Storage options.
- Enforcement.

4.5.16 During a review of the policy the Panel noted that the document provided clear details of the aims and objective of the policy and the overall information was clear and relatively precise.

4.5.17 The Panel noted that one of the aims of the policy was to provide a consistent permissions process and to ensure that everyone was aware of the health and safety risks associated with the storage of mobility scooters and their responsibilities in relation to this.

4.5.18 The KNH Equality Scheme 2012-15 which was adopted in January 2012 includes a summary of equality analyses undertaken by KNH during the periods 2009 -11 one of which was an analysis of the mobility scooter scheme. The Panel noted that KNH highlighted a number of issues relating to the scheme including:

- The need for KNH to regulate the use and storage of scooters in communal areas to avoid putting disabled residents at increased risk of harm.
- That a policy that is too restrictive could impact on a disabled customer's access and increase the risk of social exclusion and isolation.

4.5.19 The Equality Scheme also details the outcomes of the mobility scooter policy which includes: working with KNH's disability forum to help develop the policy; plans to develop a easy read guide on how to look after scooters; and a commitment from KNH that it will take a common sense approach focused on the customer to resolve potential health and safety and fire safety risks.

4.5.20 During discussions with KNH officers that included a representative from the WYFRS the dangers associated with mobility scooters were highlighted and the Panel was shown a picture that clearly demonstrated the devastating destruction caused by a mobility scooter fire.



An example of the potential destruction that can be caused by a Mobility Scooter fire

4.5.21 A representative from the WYFRS informed the Panel that the WYFRS supported the view taken by KNH that wherever possible mobility scooters should be stored outside.

4.5.22 Communal Cleaning

4.5.23 In November 2007 a report from KNH to the Batley and Spennings Tenant Committee that was consulting on the introduction of communal cleaning stated that one of the key reasons for the service was *“to meet the needs of tenants in those blocks who cannot contribute towards the cleaning or who are discouraged from cleaning by the actions of their neighbours.”*

4.5.24 The Panel interpreted this reason to be a way of offering some residents, such as the elderly, disabled or vulnerable, who are unable to clean the opportunity to be provided with a relatively cost effective cleaning service.

4.5.25 KNH officers informed the Panel that KNH had identified many situations where the communal cleaning had been left to one individual and this was often the most vulnerable person who was least able to cope with this responsibility. The Panel was informed that this was another reason why KNH had considered an alternative option for cleaning communal areas.

4.5.26 During the review the Panel was made aware of the potential impact that the cleaning charge could have on residents with low or fixed incomes which includes a significant number of elderly, disabled and vulnerable residents. The November 2007 report to the Batley and Spennings Tenant Committee included details of the consultation exercise that had taken place and the Panel noted that one consultee had raised this as an issue stating *“it is likely that the introduction of a service charge will have a disproportionate impact upon people on low income.”*

4.5.27 However the Panel also noted the comment from the same consultee that the cleaning service also provided many positive impacts such as an improvement to the environment, health and safety. The Panel noted the suggestion in the report that the issue of affordability could be potentially offset by an anti-poverty strategy that could include targeted budget and debt advice.

4.5.28

PANEL VIEW

- The Panel welcomes the approach being taken by KNH in introducing a risk based approach towards supporting individuals and would hope that this initiative continues to be developed.
- The Panel feels that the Mobility Scooter Policy is clear, transparent and fair and welcomes the approach that KNH has taken in developing this policy.
- The Panel supports the views of KNH and the WYFRS that wherever possible mobility scooters should be stored outside of the buildings.
- The Panel notes the suggestion to address issues of affordability through targeted support and advice and would wish to see that KNH continues to explore initiatives that focus on dealing with these important and sensitive issues.

5.0 SUMMARY OF ALL RECOMMENDATIONS

5.1 That measures are taken to improve the consistency and communication of the risk management policy in communal areas, this should include:

- Developing an action plan detailing steps that can be taken to improve the communication to relevant residents covering the fire risk management approach to communal areas.
- Making clear as part of the communication that KNH will discuss requests to furnish communal areas (within the parameters of the guidance) and that each request will be individually assessed to take account of the specific circumstances of the case.
- Ensuring that all requests include the input of both the local Estate Management Officer and the Area Housing Manager and following consultation with the residents that the final decision is recorded and communicated by way of a letter to residents that clearly states the reasons for the decision.
- Amending the policy to provide greater clarity on the criteria for allowing a variation of the policy and the scope of changes that could be made.

5.2 That Kirklees Neighbourhood Housing (KNH) review and amend the document 'Overview of KNH Approach to Fire safety For the Homes It Manages' with the aim of re-launching it as the formal KNH policy covering fire safety. The revised document should include:

- A document that is dated and has a title that clearly states it is the KNH Fire Safety Policy and includes a policy review statement.
- The inclusion of a formal sign off by the Chief Executive of KNH as the person who has overall responsibility for the management of fire safety.
- A greater emphasis on the fire safety policies (the rules/the intent) rather than the procedures (the implementation of policy).
- The inclusion of a matrix that identifies the key positions within KNH and externally (such as the Building Control Fire Safety Team) that can be considered as having responsibility for fire safety including a brief overview of roles and responsibilities

5.3 That KNH explores ways in which it can include the role of residents and the Kirklees Cleaning Service (KCS) in fire safety. This could include:

- Developing a framework to establish formal fire safety reporting and working arrangements between KCS and KNH.
- Considering how KNH recognises the role of residents including: reviewing the feasibility of the introduction of clear resident guidelines; promoting examples of good practice; formalising reporting arrangements; and reporting on the resolution of issues raised.

5.4 That KNH uses its ongoing fire safety audits to focus on reviewing the areas highlighted by the Panel's inspections with a priority on the issues relating to the consistency of fire safety signage; the extent by which residents are not

adhering to the law that prohibits smoking in communal areas; and the condition of entrance locks and security systems. The results of these audits should be recorded and include details of the findings and proposed measures to deal with any identified risks or failings.

- 5.5 That steps are taken to improve the communication to residents relating to their responsibilities covering the cleanliness of communal areas; the processes that are followed where the communal cleaning service is to be introduced; and the standards of the service. This should include:
- Producing a policy or document that includes:
 - The residents' responsibilities in maintaining communal areas including clear guidelines on the minimum standards of cleanliness and highlighting the implications if the required standards are not met.
 - An explanation of the consultation process that is followed when proposing the introduction of the communal cleaning service including details of options available to residents.
 - Details of the communal cleaning specification.
 - Developing an action plan detailing methods that can be taken to help ensure that the above information is effectively communicated to all existing and new residents
- 5.6 That KNH in conjunction with KCS investigate ways of speeding up the time it takes to introduce a new block to the communal cleaning service. This should be done in consultation with relevant stakeholders such as the Living in Flats Group.
- 5.7 That the following actions be taken to enable residents a greater opportunity to comment on the standards of cleaning and provide a more robust monitoring process:
- That KNH explore ways of involving residents in the monitoring of standards which could include developing a feedback sheet that will enable and encourage residents to comment on the service.
 - Reviewing the processes followed in dealing with cleaning complaints including developing a system to centrally record complaints in order to help identify common issues or specific areas of concern and formalising feedback to residents on any agreed actions.
- 5.8 That KNH explore methods, such as the introduction of a star rating system, that can be used to help encourage and support both tenants who undertake their own cleaning and the service provided by KCS to achieve a consistently high standard of cleanliness.

6.0 ATTENDEES AND WITNESSES-

The review was carried out between December 2011 and March 2012 and included receiving and reviewing a variety of information and holding interviews with:

- Philip Bellinger –Area Housing Manager, KNH
- Paolo Colagiovanni – Senior Building Surveyor, Kirklees Council
- Paul Costello – Senior Cleaning Manager, Kirklees Council
- Alison Dawson – Area Housing Manager, KNH
- David Detraux – Senior Estate Management Officer, KNH
- Antony Dyson – Senior Estate Management Officer, KNH
- Elaine Ellis – Specialist Cleaning Manager, Kirklees Council
- Howard Fanning – Police & Fire Liaison Officer, KNH
- John Gorell – Assistant Programme & Strategy Manager, KNH
- Fiona Green – Estate Management Officer, KNH
- Paul Hertzberg – Area Housing Manager, KNH
- Alistair Kimpton – Project Manager, KNH
- Ray Ram – Area Housing Manager, KNH
- Jack Riley – West Yorkshire Fire & Rescue Service

In addition to meeting with officers from KNH and Kirklees Council the Panel met with a number of residents and representatives of the Living in Flats Group.

7.0 SOURCES OF EVIDENCE

- A short guide to making your premises safe from fire – Chief Fire Officers' Association.
- Examples of Fire Risk Assessment and Fire Risk Surveys – supplied by KNH.
- Examples of Fire Safety Logs – supplied by KNH.
- Extract from Hometruths – Kirklees Federation of Tenants and Residents Associations – March 2004.
- Fire Protection Policy – Fire Protection Concordat – West Yorkshire Fire & Rescue Authority & Kirklees Council.
- Fire Risk Management Policy – One Housing Group.
- Fire Safety – Evacuation Advice for Residents – KNH.
- Fire Safety Low Rise Blocks Common Areas – Wakefield and District Housing.
- KNH Equality Scheme 2012-15 – KNH – January 2012.
- Legislative Overview – A guide to the Regulatory Reform (Fire safety) order 2005 – Communities and Local Government.
- Local Government Group Guidance – Fire Safety in purpose – built blocks of flats – July 2011.
- Mobility Scooter Policy – KNH, December 2011.
- New Tenancy Agreement – KNH.
- Overview of KNH Approach To Fire Safety For the Homes It Manages – KNH.
- Paperwork detailing the background to communal cleaning – supplied by the Living in Flats Group.
- Procedure and Guidance Fire Safety Order – Implications for Flats – West Yorkshire Fire & Rescue Service – June 2010.
- Report to Batley & Spen Tenant Committee – Communal Cleaning – November 2007.
- Report to Cabinet – Communal Cleaning Service – March 2008
- Report to Finance & Performance sub-committee – report on the results of the communal cleaning – November 2005.
- Report to KNH Strategy Committee – Fire Safety Policy and Advice – August 2010.
- Safety in Communal area – information for residents living in blocks of flats – bpha (Bedfordshire Pilgrims Housing Association).
- Service Level Agreement between Kirklees Neighbourhood Housing and Kirklees Cleaning Services.
- The Regulatory Reform (Fire Safety) Order 2005.

APPENDIX 1A

Appendices 1A – 1C and appendix 2 reflect the evidence from panel members who visited a number of blocks across Kirklees. The Panel acknowledges that the number of blocks visited represents a relatively small sample and accepts that the results will not necessarily represent an accurate picture of all communal areas.

Analysis of 2 Storey Blocks covering Fire Safety

OBSERVATION	Yes	No
Cigarette receptacles present	1	15
Good state of repair	13	3
Lock/security system working	11	5
Rubbish free entrance	14	2
Rubbish around building outside	0	16
Any sign of Anti-social behaviour	9	7
Security Lighting	8	8
CCTV	0	16
Wheelie/Rubbish bins away from doors etc	16	0
Furnishings in communal area	9	7
No smoking signs	11	5
Evidence of smoking	10	6
Evacuation procedure notices	2	14
Information notices about contents allowed	1	15
Smoke alarms	5	11
Emergency lighting	4	12
Secure electric cupboards	9	7
Bin stores and cupboards secure	15	1
Refuse chutes clear	n/a	n/a
Internal Fire doors operational	13	3
Fire exits operational	13	3
Mobilty scooters or large items in area	1	15
Storage for above	1	15

16 Blocks observed

Analysis of 3 Storey Blocks covering Fire Safety

OBSERVATION	Yes	No
Cigarette receptacles present	0	21
Good state of repair	12	9
Lock/security system working	12	9
Rubbish free entrance	16	5
Rubbish around building outside	6	15
Any sign of Anti-social behaviour	10	11
Security Lighting	3	18
CCTV	13	8
Wheelie/Rubbish bins away from doors etc	20	1
Furnishings in communal area	7	14
No smoking signs	18	3
Evidence of smoking	7	14
Evacuation procedure notices	5	16
Information notices about contents allowed	3	18
Smoke alarms	2	19
Emergency lighting	2	19
Secure electric cupboards	14	7
Bin stores and cupboards secure	11	10
Refuse chutes clear	n/a	n/a
Internal Fire doors operational	20	1
Fire exits operational	21	0
Mobility scooters or large items in area	2	19
Storage for above	0	21

21 Blocks observed

Analysis of Multi Storey (above 3 floors) Blocks covering Fire Safety

OBSERVATION	Yes	No
Cigarette receptacles present	0	5
Good state of repair	4	1
Lock/security system working	5	0
Rubbish free entrance	5	0
Rubbish around building outside	0	5
Any sign of Anti-social behaviour	3	2
Security Lighting	5	0
CCTV	3	2
Wheelie/Rubbish bins away from doors etc	5	0
Furnishings in communal area	1	4
No smoking signs	4	1
Evidence of smoking	3	2
Evacuation procedure notices	4	1
Information notices about contents allowed	1	4
Smoke alarms	5	0
Emergency lighting	5	0
Secure electric cupboards	5	0
Bin stores and cupboards secure	5	0
Refuse chutes clear	4	1
Internal Fire doors operational	4	1
Fire exits operational	5	1
Mobilty scooters or large items in area	0	5
Storage for above	0	5

5 Blocks Observed

APPENDIX 2

The Panel has attempted to rate the standards of cleanliness as consistently as possible however accepts that assessing the cleanliness of an area is subjective and opinions will differ from person to person.

The Panel acknowledges that the results of these inspections will not necessarily reflect the standard of cleanliness being maintained by residents or the service being provided by Kirklees Cleaning Service.

Analysis of Blocks Receiving the Communal Cleaning Service.

Location	Very clean	Clean	OK	Dirty	Very Dirty
Foyer	4	6	1	3	0
Staircase	4	5	1	3	1
Landings	5	6	0	2	1
Banisters & Rails	3	5	2	3	1
Safe reach Internal window	3	4	3	4	0
High level Internal window	2	3	7	2	0
Entrance doors	3	4	2	5	0
Flat doors	2	5	3	4	0

14 Blocks observed.

Analysis of Blocks Cleaned by Tenants.

Location	Very clean	Clean	OK	Dirty	Very Dirty
Foyer	0	4	6	12	1
Staircase	0	6	5	11	1
Landings	0	6	5	11	1
Banisters & Rails	0	3	10	10	0
Safe reach Internal window	0	3	6	14	0
High level Internal window	0	3	5	14	1
Entrance doors	0	3	7	12	1
Flat doors	0	4	11	8	0

23 Blocks observed

KFTRA SCRUTINY PANEL ACTION PLAN

Project: Review of Communal Areas
Lead Scrutiny Officer: Richard Dunne

			FOR COMPLETION			
No.	Recommendation	KNH Officer(s) asked to coordinate the response to the recommendation	Do you agree with the recommendation? If no, please explain why.	How will this be implemented?	Who will be responsible for implementation?	What is the estimated timescale for implementation?
1	<p>That measures are taken to improve the consistency and communication of the risk management policy in communal areas, this should include:</p> <ul style="list-style-type: none"> • Developing an action plan detailing steps that can be taken to improve the communication to relevant residents covering the fire risk management approach to communal areas. • Making clear as part of the communication that KNH will discuss requests to furnish communal areas (within the parameters of the guidance) and that each request will be individually assessed to take account of the specific circumstances of the case. 	Christine Gummerson	YES	<p>The KNH Fire Safety Group will be taking steps to improve communication of the risk management policy in communal areas and this will include ensuring that residents are aware of the fire risk management approach and are clear about how requests to furnish communal areas will be dealt with, who will make the decision and how the decision will be communicated and explained..</p> <p>The risk management policy will be reviewed to ensure that there is more clarity on the criteria for allowing any variation of the policy and clarity on the scope for changes that might be made.</p>	KNH Fire Safety Officer Group (John Gorell, Ray Ram, Howard Fanning Joe Maundrill)	Nov 2012

	<ul style="list-style-type: none"> Ensuring that all requests include the input of both the local Estate Management Officer and the Area Housing Manager and following consultation with the residents that the final decision is recorded and communicated by way of a letter to residents that clearly states the reasons for the decision. Amending the policy to provide greater clarity on the criteria for allowing a variation of the policy and the scope of changes that could be made. 					
2	<p>That Kirklees Neighbourhood Housing (KNH) review and amend the document 'Overview of KNH Approach to Fire safety For the Homes It Manages' with the aim of re-launching it as the formal KNH policy covering fire safety. The revised document should include:</p> <ul style="list-style-type: none"> A document that is dated and has a title that clearly states it is the KNH Fire Safety Policy and includes a policy review statement. The inclusion of a formal sign off by the Chief Executive of KNH as the person who has overall 	Christine Gummerson	YES	<p>The KNH Fire Safety Group will review and amend the document 'Overview of KNH Approach to Fire Safety For the Homes it Manages' and re launch it as the formal KNH policy covering fire safety.</p> <p>The new policy document will include all the recommendations agreed.</p>	KNH Fire Safety Officer Group	Nov 2012

	<p>responsibility for the management of fire safety.</p> <ul style="list-style-type: none"> • A greater emphasis on the fire safety policies (the rules/the intent) rather than the procedures (the implementation of policy). • The inclusion of a matrix that identifies the key positions within KNH and externally (such as the Building Control Fire Safety Team) that can be considered as having responsibility for fire safety including a brief overview of roles and responsibilities. 					
3	<p>That KNH explores ways in which it can include the role of residents and the Kirklees Cleaning Service (KCS) in fire safety. This could include:</p> <ul style="list-style-type: none"> • Developing a framework to establish formal fire safety reporting and working arrangements between KCS and KNH. • Considering how KNH recognises the role of residents including: reviewing the feasibility of the introduction of clear residents guidelines; promoting examples of good practice; formalising reporting arrangements; and reporting on the 	Christine Gummerson	YES	<p>The KNH Fire Safety group will be considering how it can involve residents and the Kirklees Cleaning Service in alerting KNH to fire safety concerns in a more structured way not withstanding that the clear responsibility for identifying and responding to risks rests with KNH officers. Consultation on any proposals will be undertaken with KFTRA and KCS.</p>	KNH Fire Safety Officer Group	Dec 2012

	resolution of issues raised.					
4	<p>That KNH uses its ongoing fire safety audits to focus on reviewing the areas highlighted by the Panel's inspections with a priority on the issues relating to: the consistency of fire safety signage; the extent by which residents are not adhering to the law that prohibits smoking in communal areas; and the condition of entrance locks and security systems. The results of these audits should be recorded and include details of the findings and proposed measures to deal with any identified risks or failings.</p>	Christine Gummerson	YES	The KNH Fire Safety Group will be considering all the recommended actions and ensuring that these are incorporated into the fire safety audit process.	KNH Fire Safety Officer Group	Nov 2012
5	<p>That Steps are taken to improve the communication to residents relating to their responsibilities covering the cleanliness of communal areas; the processes that are followed where the communal service is to be introduced; and the standards of the service. This should include:</p> <ul style="list-style-type: none"> Producing a policy or document that includes: The residents' responsibilities in maintaining communal 	Steve Wilkinson	YES	We would propose that improved communications would be achieved through the production of a "Management of Communal Areas " document which links with recommendations 5.2 and 5.3 in relation to providing clearer and better quality information to residents on fire safety. This will cover tenant responsibilities, standards, procedures and consultation arrangements when proposing the introduction of a cleaning service and how complaints on quality of service will be dealt with. New tenants of properties with communal areas	Philip Bellinger Ray Ram	Dec 2012

	<p>areas including clear guidelines on the minimum standards of cleanliness and highlighting the implications if the required standards are not met.</p> <ul style="list-style-type: none"> • An explanation of the consultation process that is followed when proposing the introduction of the communal cleaning service including details of options available to residents. • Developing an action plan detailing methods that can be taken to help ensure that the above information is effectively communicated to all existing and new residents 			<p>will also be provided with clearer information on their responsibilities under the tenancy agreement at sign up stage. We will explore the option of creating a summary leaflet on managing communal areas for distribution to all residents living in communal blocks. The work plan driving these changes and all communication documents will be developed in consultation with KFTRA.</p>		
6	<p>That KNH in conjunction with KCS investigate ways of speeding up the time it takes to introduce a new block to the communal cleaning service. This should be done in consultation with relevant stakeholders such as the Living in Flats Group.</p>	Steve Wilkinson	YES	<p>A computerised workflow process is now in place for Estate Management Officers to follow when introducing a communal cleaning service with timescales built in for each stage of the process. We will review this to see if there is any potential to speed up the process but as this involves serving statutory notices this may be difficult. We will hold early discussions with KCS to seek to identify ways of reducing the time lag from decision to introduce a service and implementation.</p>	Philip Bellinger	Oct 2012

				Consultation on any agreed changes will be carried out with key stakeholders.		
7	<p>That the following actions be taken to enable residents a greater opportunity to comment on the standards of cleaning and provide a more robust monitoring process:</p> <ul style="list-style-type: none"> • That KNH explore ways of involving residents in the monitoring of standards which could include developing a feedback sheet that will enable and encourage residents to comment on the service. • Reviewing the processes followed in dealing with cleaning complaints including developing a system to centrally record complaints in order to help identify common issues or specific areas of concern and formalising feedback to residents on any agreed actions. 	Steve Wilkinson	YES	<p>In conjunction with KCS we will undertake a review of how we can improve the quality and frequency of customer satisfaction and how we can adopt a more robust approach to the analysis of customer complaints. Primarily this will be through looking at how can strengthen the requirement for the cleaning contractor to adopt more robust monitoring of cleaning standards. Any proposals for changes to service delivery as a result of such analysis will be shared with KFTRA. One option will be to amend the cleaning completed notification slip to include a comments and feedback section – this would bring us in line with the approach we use for grounds maintenance services.</p>	Philip Bellinger	Jan 2013
8	<p>That KNH explore methods, such as the introduction of a star rating system, that can be used to help encourage and support both tenants who undertake their own cleaning and the service provided by KCS to achieve a consistently</p>	Steve Wilkinson	YES	<p>We will link required actions with the response to recommendation 7 as improved monitoring of customer satisfaction levels and volumes/types of complaints will allow us to consider options for establishing a method of assessing overall standards of each block. We will also encourage EMOs to</p>	Philip Bellinger	Jan 2013

	high standard of cleanliness.			use informal methods of feeding back to residents and TRAs as a way of encouraging the maintenance of high standards eg sending letters when a block has been particularly well maintained. Whilst we accept the stated need to achieve consistency of standards across all blocks irrespective of whether they are resident-maintained or in receipt of a cleaning service inevitably there will have to be some degree of variation in assessment methods and remedies to reflect that one is voluntary and one is contractual.		
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