



## Housing Management and Almshouses Sub (Community and Children's Services) Committee

**Date:** WEDNESDAY, 29 NOVEMBER 2023  
**Time:** 1.45 pm  
**Venue:** COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

**Members:** Ruby Sayed (Chairman)  
Helen Fentimen (Deputy Chairman)  
Joanna Tufuo Abeyie  
Jamel Banda  
Mary Durcan  
Deputy John Fletcher  
Henrika Priest  
Ceri Wilkins  
Alderwoman Susan Pearson  
1x Vacancy

**Enquiries:** Rhys Campbell  
rhys.campbell@cityoflondon.gov.uk

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**Ian Thomas CBE**  
**Town Clerk and Chief Executive**

# AGENDA

## Part 1 - Public Reports

1. **APOLOGIES**

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

3. **MINUTES**

To approve the public minutes and non-public summary of the meeting on 17 April 2023.

**For Decision**  
(Pages 5 - 8)

4. **OUTSTANDING ACTIONS**

Members are asked to note the Sub-Committee's Action Tracker.

**For Information**  
(Pages 9 - 10)

5. **FIRE SAFETY UPDATE**

Report of the Executive Director, Community and Children's Services.

**For Decision**  
(Pages 11 - 18)

6. **HOUSING MAJOR WORKS PROGRAMME - PROGRESS REPORT**

Report of the Executive Director, Community and Children's Services.

**For Information**  
(Pages 19 - 36)

7. **TENANT SATISFACTION SURVEY**

Report of the Executive Director, Community and Children's Services.

**For Information**  
(Pages 37 - 48)

8. **GUEST ROOMS REVIEW**

Report of the Executive Director, Community and Children's Services.

**For Decision**  
(Pages 49 - 54)

9. **UNREASONABLE BEHAVIOUR POLICY**

Report of the Executive Director, Community and Children's Services.

**For Decision**  
(Pages 55 - 72)

10. **INDEPENDENT ACCESS REVIEW OF OUR SOCIAL HOUSING ESTATES**

Report of the Executive Director, Community and Children's Services.

**For Information**  
(Pages 73 - 150)

11. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

12. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

13. **EXCLUSION OF THE PUBLIC**

MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part I of Schedule 12A of the Local Government Act.

**Part 2 - Non-Public Reports**

14. **NON-PUBLIC MINUTES**

To approve the non-public minutes of the meeting held on 17 April 2023.

**For Decision**  
(Pages 151 - 152)

15. **HOUSING REVENUE ACCOUNT REPAIRS & MAINTENANCE NEW CONTRACT (VERBAL UPDATE)**

Report of the Executive Director, Community and Children's Services.

**For Information**

16. **EXTENSION TO REPAIRS AND MAINTENANCE CONTRACTS**

Report of the Executive Director of Community and Children's Services.

**For Information**  
(Pages 153 - 162)

17. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
  
18. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

**HOUSING MANAGEMENT AND ALMSHOUSES SUB (COMMUNITY AND CHILDREN'S SERVICES) COMMITTEE**  
**Monday, 17 April 2023**

Minutes of the meeting of the Housing Management and Almshouses Sub (Community and Children's Services) Committee held at Committee Rooms, 2nd Floor, West Wing, Guildhall on Monday, 17 April 2023 at 11.00 am

**Present**

**Members:**

Deputy Marianne Fredericks (Chairman)  
Timothy James McNally (Deputy Chairman)  
Deputy John Fletcher  
Mary Durcan  
Helen Fentimen  
Joanna Tufuo Abeyie

**Officers:**

Alan Bennetts	- Comptroller and City Solicitor's Department
Liam Gillespie	- Community and Children's Services Department
Jason Hayes	- Community and Children's Services Department
Paul Murtagh	- Community and Children's Services Department
Marie Rene	- Community and Children's Services Department
Mathew Stickley	- Town Clerk's Department

**1. APOLOGIES**

Apologies for absence were received from John Griffiths. Jamel Banda, Henrika Priest, Ruby Sayed, Ceri Wilkins joined online.

**2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were no declarations of interest.

**3. MINUTES**

In discussing matters arising from the previous meeting, the committee discussed mould in properties caused by lack of ventilation. Officers confirmed that provisions for ventilation were in place when new windows were installed in Corporation properties. The committee also discussed the work to install a communal heating system for Petticoat Tower and Middlesex Street ball game

courts, officer support for Community Infrastructure Levy bids, and that a report on guest flats would be brought to the next meeting of the committee.

**RESOLVED** – That the public minutes and non-public summary of the meeting held on 30 January 2023 be approved as a correct record.

4. **OUTSTANDING ACTIONS**

Members received a report of the Town Clerk regarding outstanding actions.

In response to questions, officers confirmed that reports on charging points and automatic door entries would be reported to the next meeting of the committee.

**RESOLVED**, that the report be noted.

5. **HOUSING MAJOR WORKS PROGRAMME - PROGRESS REPORT**

The Sub Committee received a report of the Director, Community and Children's Services, which updated Members on the Housing Major Works Programme and issues affecting progress on individual schemes.

The committee discussed what charges had been levied for heating and that officers would confirm this and if any losses needed to be recovered for residents. In response to questions, officers confirmed that the £95m Major Works Programme would be reported to the next meeting of the committee with spend per estate. The committee discussed causes of delays to works, the need to determine the funding of the currently £30m of works which were proposed but unfunded, and the decision of works at Crescent House to be completed with vacuum rather than triple glazing for reasons of affordability.

**RESOLVED**, that the report be noted.

6. **DURATION OF RIGHT TO BUY LEASES (HRA)**

The Sub Committee considered a report from the Director, Community and Children's Services regarding the duration of Right to Buy Leases (HRA).

Following receipt of a letter from tenant associations, the committee agreed to defer the report to allow for a more detailed report on the matter and related issues to be brought to the committee at a later date.

**RESOLVED:** To defer the report.

7. **GW5 ISSUES: DRON HOUSE WINDOW REPLACEMENT AND COMMON PARTS REDECORATIONS**

The Sub Committee considered a report from the Director, Community and Children's Services regarding GW5 Issues: Dron House Window Replacement and Common Parts Redecorations.

**RESOLVED, to**

1. approve the additional budget of £54,225 to reach Gateway 6 of which £48,010 is associated with the variation for AD Construction (works) and £6,215 for the extension of time for Contract Administration duties undertaken by Playle and Partners (fees).
2. Note the new total estimated cost of the project at £1,659,146

**8. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

In response to a question from Timothy McNally regarding the provision of ten-storey ladders across London, in response to which officers agreed to bring a report to a future meeting of the committee outlining the policy on ladders for Corporation estates.

In response to a question from Deputy Marianne Fredericks regarding the repairs and reporting process on Corporation estates, a motion was moved by Deputy Marianne Fredericks, seconded by Timothy McNally, asking that officers investigate arbitration systems which could be implemented to handle housing-related complaints. This was put to the committee and agreed.

**RESOLVED:** that, with regard to the discussion at this meeting and accounting for members' comments shared in the coming weeks, officers are asked to investigate options for an arbitration system to address housing-related complaints, and that a report on this proposal is reported back to this sub committee in due course.

**9. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

The Chairman advised the committee that she had accepted a report on the Independent Review of the Security of our Social Housing Estates as urgent business in line with the provisions of the Local Government Act 1972 to allow for full discussion at this sub committee to inform any decisions to be taken by the parent committee, and that such a decision is not delayed any further.

The committee discussed the implications on estate security of changes to access arrangements, the overall provision of security on Corporation housing estates, and the timeline for security improvement works.

**RESOLVED:** to note the recommendations emanating from the independent review into the security of Corporation social housing estates.

**10. EXCLUSION OF THE PUBLIC**

**RESOLVED –** That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

11. **NON-PUBLIC MINUTES**

**RESOLVED** – That the non-public minutes of the meeting held on 30 January 2023 be approved as a correct record.

12. **MANAGEMENT UPDATE REPORT FOR THE CITY OF LONDON  
ALMSHOUSES AND SHELTERED HOUSING LETTINGS**

The Sub-Committee considered a report of the Executive Director of Community and Children’s Services regarding the City of London Almshouses and Shelters Housing lettings.

13. **SAVILLS - STRATEGIC REVIEW OF HRA COSTS AND SERVICES**

The Sub Committee received a report of the Chamberlain and Executive Director of Community and Children’s Services regarding Savills Strategic Review of Housing Revenue Account Costs and Services.

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB  
COMMITTEE**

There were no non-public questions.

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT  
AND WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED  
WHILST THE PUBLIC ARE EXCLUDED**

Members received an update on fires on Corporation estates.

16. **The meeting ended at 13:08.**

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Chairman

**Contact Officer: Matthew Stickley**  
**matthew.stickley@cityoflondon.gov.uk**



**Community & Children's Services**

**Members Update**

<b>Date Added</b>	<b>Subject</b>	<b>Action Agreed</b>	<b>Responsible Officer</b>	<b>Target Meeting Date - HMASC</b>	<b>Update</b>
22.02.2021	Vehicle charging points at Middlesex Street and Golden Lane.	Members noted that it would still be possible to apply for funding for the 2021/22 financial year, and Members will be updated once the initial report is received from the consultants.	Pam Wharfe	November 2023	Our consultant, WSP has completed the assessments across our estates and submitted its reports. WSP is preparing a specification to procure the works and, an application for funding. Verbal Update
08.07.2022	Automatic door devices.	Report to be provided with further detail on automatic door-opening devices at estates	Liam Gillespie/Pam Wharfe	November 2023	To be reviewed in line with the Access Report to go to HMASC in November.
17.04.2023	Arbitration Panel as part of the Complaints Process.	Look at introducing Arbitration Panel to review complaints before referral to Housing Ombudsman.	Liam Gillespie	January 2024	
17.04.2023	New Repairs and Maintenance Contract to include consideration of compensation to be paid by contractor to residents for its failings.	Review the introduction of contractor compensation and incentivisation clauses in new R&M contract. Liaise with colleagues in legal and City Procurement.	Michael Gwyther-Jones	March 2024	
17.04.2023	Housing Complaints Compensation Policy	Members to see the Housing Complaints Policy as part of a report into Housing Complaints generally.	Liam Gillespie	January 2024	

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<b>Committee(s):</b> Housing Management & Almshouses Sub-Committee – For Decision	<b>Dated:</b> 29 November 2023
<b>Subject:</b> Fire Safety Update – HRA Properties	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1, 2, 4, 12
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of</b> Judith Finlay Executive Director of Community & Children’s Services	<b>For Decision</b>
<b>Report author:</b> Paul Murtagh Assistant Director, Housing and Barbican Department of Community & Children’s Services	

## Summary

The purpose of this report is to provide Members of this Committee with information on how the City of London Corporation (the Corporation), through its Housing Property Services Team, is ensuring that its homes on its twelve social housing estates are managed in a way that meets compliance with current health and safety legislation, best practice, and regulatory standards relating to fire safety.

## Recommendations

Members are asked to:

1. Note, consider, and comment on the report.
2. Agree to the creation of a Housing Compliance Working Party, comprising officers and members, to have oversight of the work that the Corporation is doing to ensure it remains compliant with current health and safety legislation, best practice, and regulatory standards relating to fire safety and other relevant statutory housing safety legislation.

## Main Report

### Background

1. In July 2017, an initial detailed report was presented to the Community & Children’s Services Committee, the Housing Management & Almshouses Sub-Committee and the Audit and Risk Management Committee updating Members on the Corporation’s approach to fire safety in its social housing portfolio. This report informed Members of the progress we had made with matters such as:

- fire risk assessments,
  - communication with residents,
  - estate management,
  - fire safety maintenance and improvement work,
  - inspections by the London Fire Brigade (LFB),
  - potential future improvement works.
2. Further update and review reports have been brought back to the Housing Management & Almshouses Sub-Committee on several occasions to inform Members of the work that has been done to enhance the safety of the Corporation's social housing estates and its residents in the event of fire.
  3. This report is intended as a further update.

## **Considerations**

### **Automatic Water Fire Suppression Systems (Sprinklers)**

4. Members of the Community & Children's Services Committee have previously agreed a recommendation from its Director to retrofit automatic water suppression systems in each of its five social housing high-rise tower blocks below:
  - Great Arthur House, Golden Lane Estate;
  - Petticoat Tower, Middlesex Street Estate;
  - West Point, Avondale Square Estate;
  - Centre Point, Avondale Square Estate;
  - East Point, Avondale Square Estate.
5. Following completion of a compliant, competitive tendering exercise, United Living was appointed to carry out the installation of automatic water suppression systems in each of the Corporation's five social housing high-rise tower blocks. However, due to escalating costs and potential time delays, Great Arthur House and Petticoat Tower were subsequently removed from the contract with United Living.
6. Although the retrofitting of sprinklers is a complex and challenging project, we are making good progress with the works as set out below.

#### West Point, Centre Point and East Point – Avondale Square Estate

Works are progressing well across the three Avondale Square Point Blocks, with completion now expected by the end of September 2023. Of the 222 properties in the three blocks, four leaseholders have not yet provided access, two tenants have refused access (legal proceedings have commenced) and two tenants require further assistance.

Despite the intrusive nature of the works, resident satisfaction, gauged from ours and the contractor's in-house surveys has been largely positive, with no "very dissatisfied" scores for any aspects of the work and, only a few "fairly dissatisfied"

scores in June. The issues that caused residents to be 'fairly dissatisfied' were identified and promptly addressed.

#### Petticoat Tower – Middlesex Street Estate

The successful contractor, Harmony Fire, is due to start on site in mid-October, beginning with pre-condition surveys, site setup, and booking installation appointments with residents. Additional asbestos surveys will be required for approximately 50% of the 88 flats.

We are preparing for a busy period of engagement with residents with open viewings of the completed and redecorated pilot flat on 27 September, and a "Meet the Contractor" event scheduled for 4 October.

#### Great Arthur House – Golden Lane Estate

Members will be aware from previous reports that the sprinkler installation at Great Arthur House is to be incorporated into a wider compartmentation and fire safety works project.

### **Fire Doors**

7. As Members will be aware, the Corporation has committed to replacing all front entrance doors in its residential blocks of flats with fire doors that give up to 60 minutes fire resistance (30 minutes as an absolute minimum). The Fire Door Replacement Programme, also provides for the installation/upgrade of fire stopping/compartmentation solutions to, for example, penetrations above and through the communal doors and frames (service pipes, service cables etc).
8. GERDA, our specialist appointed contractor, continues to make good progress with the fire door installation programme as set out below.

#### Lot 1 – York Way and Holloway Estates

The work in Lot 1, to install new upgraded replacement fire doors (front entrances and communal doors) on the York Way and Holloway Estates is now complete. Customer satisfaction with this project, as gauged from our Customer Satisfaction Surveys, was very high (around 96% satisfied or very satisfied).

#### Lot 2 – Avondale Square Estate

GERDA has installed 340 fire doors across the Avondale Square Estate that, have also clearly been very well received by residents (as evidenced by the Customer Satisfaction Surveys).

Installations to the three Point Blocks (West, East and Centre Point) are currently on hold until, the sprinkler installation programme and the work to install fibre optics (statutory undertaking) are complete.

### Lot 3 – Sumner Buildings, William Blake Estate, Dron House, Petticoat Tower (communal doors)

Work to Lot 3 has now commenced, with the first doors installed in the Sumner Buildings during the week commencing 11 September. The works to Sumner Buildings are expected to take five weeks to complete (subject to residents granting access) with William Blake Estate and Dron House to follow. The final works to Lot 3, the replacement of the communal doors in Petticoat Tower, will commence when the project for the sprinkler installation has progressed far enough to allow.

### **Fire Risk Assessments (FRA's)**

9. As Members will be aware from the report prepared for its meeting on 2 June 2023, following a corporate procurement exercise, Turner & Townsend (T&T) was appointed to undertake the next round of FRA's for the Corporation's social housing estates. Type 3 FRA's for each of our residential blocks of flats on our social housing estates were subsequently completed, analysed, and agreed.
10. Each residential block and, where appropriate, associated community centres, has its own FRA report, which made observations on key areas found on the day of the assessment. Areas identified in each of the FRA's are broadly categorised into the following:
  - issues that require immediate remedial action and could be resolved immediately by teams on site;
  - matters requiring contractor intervention;
  - matters that are/will be subject to or incorporated into major works projects.
11. The latest FRA's also refer to positive practices/innovation, acknowledging that some of the Corporation's fire safety and major works improvements projects go beyond the current minimum statutory requirements including, the new fire doors and installation of sprinklers. The FRA's also refer to future considerations and impacts of the introduction of new legislation, regulations, best practice etc.
12. The main themes identified by the latest FRA's undertaken by T&T include:

#### Fire doors/fire stopping/compartimentation

The areas highlighted under this category form part of the Corporation's Housing Major Works Programme. The Corporation's Fire Door Replacement Programme incorporates front entrance doors to all flats (including, associated door frames and surrounds), communal fire doors and riser/service cupboard doors (part of the fire stopping and compartmentation work). Work to replace fire doors and improve compartmentation has already been completed on two estates since the FRA's were carried out and, work has also started on several other estates. It was also noted in the FRA's, that significant related projects, including the installation of sprinklers within flats would also address concerns around fire stopping and compartmentation.

## Fire alarms

Any problems identified with existing fire alarms on the day that the FRA survey was carried out, were addressed, and remedied immediately by the on-site estate teams.

The FRA's have identified potential improvements (not statutory) in some of our homes and, in some case, these may be incorporated into future major works projects. One example of this, is the City of London's Almshouses, where it is proposed to carry out a significant upgrade to the existing fire alarm installation, to incorporate both carbon monoxide and environmental monitoring. The enhanced system will also allow for live remote monitoring of alarm activation and faults.

## Emergency lighting

As the FRA's were carried out during normal working hours, the Surveyor was unable, in most cases, to evidence that the designated emergency lighting in our blocks of flats was working to the required standard. To satisfy the requirements of the FRA, T&T relied on the Corporation to provide full and valid testing and maintenance certificates for those elements that could not be tested at the time (emergency lighting, lightning conductors, gas servicing etc).

The FRA's also highlighted that whenever emergency lighting systems are to be upgraded/replaced, due consideration must be given to the presence of 'borrowed' external lighting, which may no longer be relied upon to provide sufficient additional lighting to meet the new requirements.

## Personal Emergency Evacuation Plans (PEEPS)/Premises Information Box (PIB)

Recommendations around the use of PEEPS are contained within the latest FRA's as, at the time the surveys were carried out, it was expected that legislation would be introduced to make PEEPS mandatory in certain situations. Unexpectedly however, this did not happen.

Members will recall from previous reports however, as part of its work to ensure a high standard of fire safety in the homes it manages, the Corporation has introduced a new procedure for assessing vulnerable residents, who may need help evacuating in an emergency or, who may benefit from further help and advice on fire safety issues in their homes. We have carried out over 220 evacuation assessments for vulnerable residents and, relevant information has been included in the Premises Information Boxes (PIB) installed across our estates.

Following on from the completion of the latest FRA's, the number, location, and contents of the PIBs have been reviewed to ensure they are readily accessible for emergency responders. Secure PIBs have been refreshed to include person (resident) vulnerability lists. These lists are refreshed every six months or, when new person specific information becomes known. No personal details are included within the list, only their location within the residential block.

## Testing/records

As stated previously, in the case of emergency lighting, a key part of the FRA process is demonstrating that systems and equipment in our blocks of flats are tested as per the required regulatory frequency. In addition to the testing, records are kept demonstrating effective management of both active and passive fire protection.

13. An overall Action Plan has been developed, that is a collective summary of the recommendations identified by T&T on all blocks of flats on each of our social housing estates. An example of the individual Action Plan developed for the Corporation's York Way Estate was included as an appendix to the report to this committee at its meeting on 2 June 2023. Progress against the Action Plan will continue to be reported to this Sub Committee on a quarterly basis.
14. Carrying out FRA's under the Regulatory Reform (Fire Safety) Order 2005 (RRO), is a vital and legally required part of the CoLC's fire safety strategy for its residential portfolio. The RRO does not however, specify how often FRA's should be carried out or reviewed. Officers have been working very closely with colleagues in the Corporate Fire Safety team to ensure that FRA's on our housing estates are not only carried out in line with the provisions of the RRO but also, are carried out in accordance with the Corporation's own guidance, best practice, and the Fire Risk Assessment Prioritisation Tool.

## **Great Arthur House**

15. As Members have been advised previously, due to the unique nature of the building and its issues, Great Arthur House is being dealt with as a 'special project' in terms of the fire safety works.
16. As a result of concerns with the level of compartmentation in Great Arthur House, we have carried out a series of precautionary improvement works including:
  - the installation of a permanent hard-wired fire alarm system to the whole of the building;
  - the delivery, and installation where required, of individual smoke detectors to all flats in Great Arthur House;
  - the completion of a detailed 'fire safety signage survey' and subsequent upgrading of all fire safety signage to reflect the new evacuation arrangements and to pick up the deficiencies noted in the FRA's, to ensure, that the signage in the block is accurate, up-to-date and compliant;
  - the introduction of an evacuation process for residents in the event of a fire.
17. As reported to this Sub-Committee previously, following discussions between officers, colleagues in Planning and the respective consultants on the sprinkler project and this Great Arthur House project, it has been decided that this project will be 'put on hold' until the sprinkler project is completed. This makes perfect sense as, the installation of the sprinklers will considerably affect the safety of the building (and its residents) in the event of a fire and, will have a significant impact



on the level of additional fire safety measures (such as compartmentation) required in the building.

### **Housing Compliance Working Party**

18. Although members receive many reports on fire safety and compliance with other statutory measures applicable to housing through the committee process, officers are of the view that it would be of significant benefit to set up a Housing Compliance Working Party (HCWP). It is envisaged that the HCWP will comprise officers and members working together to have oversight of the work that the Corporation is doing to ensure it remains compliant with current health and safety legislation, best practice, and regulatory standards relating to fire safety and other relevant statutory housing safety legislation including:

- gas
- electricity
- water testing (legionella)
- asbestos management
- lift maintenance
- RAAC.

19. Members are asked to agree to the proposal to set up the HCWP and, to identify up to three members of this Sub Committee to work with officers to take this forward.

Paul Murtagh, Assistant Director, Barbican and Property Services

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<b>Committee(s):</b> Housing Management and Almshouses Sub (Community and Children's Services) Committee	<b>Dated:</b> 29 November 2023
<b>Subject:</b> Housing Major Works Programme – Progress Report	<b>Public</b>
<b>Which outcomes in the City Corporation’s Corporate Plan does this proposal aim to impact directly?</b>	1, 2, 12
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>N/A</b>
<b>What is the source of Funding?</b>	<b>N/A</b>
<b>Has this Funding Source been agreed with the Chamberlain’s Department?</b>	<b>N/A</b>
<b>Report of:</b> Director of Community and Children’s Services	<b>For Information</b>
<b>Report author:</b> Jason Hayes Head of Major Works, DCCS Property Services	

## Summary

The purpose of this report is to update Members on the progress that has been made with the Housing Major Works Programme and to advise Members on issues affecting progress on individual schemes.

## Recommendation(s)

Members are asked to note the report.

## Main Report

### Background

1. At its meeting on 27 November 2017, the Housing Management & Almshouses Sub-Committee received a presentation from officers in Housing Property Services on the scope of, and progress with, the Housing Major Works Programme. Members subsequently agreed that it would be useful if further updates and progress reports be brought to future meetings of this Sub-Committee.
2. The first update and progress report was presented to this Sub-Committee at its meeting on 12 February 2018. This latest update report highlights specific areas of ‘slippage’ or ‘acceleration’ since the last meeting of the Sub-Committee on 17

April 2023, as well as progress against the programme as originally reported in November 2017.

3. In line with a request from Members and, as subsequently agreed by the Community & Children's Services Committee (C&CS Committee), this report has been expanded to include information relating to Phase 2 of the Housing Major Works Programme (Future Programme).

## Considerations

4. The City of London Corporation (City Corporation) is committed to investing around £110million on a Major Works Programme for the maintenance, refurbishment, and improvement of its social housing portfolio. The works, in the main comprise:
  - Window replacements;
  - Re-roofing;
  - Decent Homes (new kitchens and bathrooms);
  - Electrical rewiring and upgrades;
  - Heating replacements;
  - Concrete repairs;
  - Fire safety improvement works.
5. The funding for these extensive works, which is intended to bring all the City Corporation's social housing stock up to, and beyond, the Decent Homes Standard, comes from the Housing Revenue Account (HRA), which is ring-fenced solely for housing. The HRA is made up of:
  - Income from rents;
  - Income from service charges.
6. The Housing Major Works Programme was originally intended to be a 5-year programme however, the size and complexity of some of the projects included, along with initial staff resourcing issues, has meant that it is more likely to take 7 or 8 years to complete.
7. The Housing Major Works Programme is monitored and managed at several levels both corporately and within the department. This includes:
  - Gateway Process;
  - Community & Children's Services Committee (C&CS);
  - Projects Sub-Committee;
  - Housing Management & Almshouses Sub-Committee;
  - Housing Programme Board.
8. The Housing Programme Board (HPB) is a cross-departmental group, chaired by the Director of Community & Children's Services and comprising senior officers from:
  - Housing Management;

- Housing Property Services;
  - City Surveyors;
  - Planning;
  - Finance;
  - Town Clerks;
  - City Procurement.
9. For the purpose of the HPB, officers have developed detailed report templates that show progress of the various works programmes, and these are analysed and discussed monthly. At its meeting on 27 November 2017, following a presentation from officers in Housing Property Services on the scope of, and progress with the Housing Major Works Programme, Members agreed that a simplified version of the progress reports be brought to future meetings of this Sub-Committee.
  10. Attached at Appendix 1 to this report, for Members' consideration, is the latest version of the progress report for the Housing Major Works Improvement Programme.
  11. Following requests from Members, projects that have been added to the original five-year Housing Major Works Programme over the last few years have been highlighted in the progress report. This helps to demonstrate the extent as to which the scope of the five-year Housing Major Works Programme has increased since its inception. Members will note from the latest progress report that the value of these additional projects is approximately £23.4million (a 43% increase in the cost of the original programme).
  12. In line with a request from Members and, as subsequently agreed by the C&CS Committee, attached to this report as Appendix 2 is Phase 2 of the Housing Major Works Programme (Future Programme). The format of Phase 2 has been designed to reflect the following:
    - a new, revised five-year programme with the dates reset to the start of the 2022/23 financial year.
    - the carryover and incorporation of projects from the original five-year Major Works Programme that will be incomplete by the beginning of the 2022/23 financial year.
    - the omission of all projects on the original five-year Major Works Programme that were substantially completed before the beginning of the 2022/23 financial year.
  13. As members will see from the 'Future Programme' at Appendix 2, there are nearly £30million of new projects that are currently '**unfunded**'. These projects comprise works identified in the Savills Stock Condition Survey (2018) and, projects that have been identified as a result of further surveys and testing works carried out as part of the current Major Works Programme.
  14. Members will note that the Future Programme is substantively unchanged from that submitted to previous meetings of this Sub Committee. The Future Programme will likely be affected by current and future economic factors and, at some time in the future, a substantial review and redrafting will be required.

Clearly, this can only be done once we have more clarity on the future funding capacity of the HRA. The report, as it stands, remains a useful reminder of the extent of work to be carried out (and forecast costs) to maintain the Corporation's Housing Estates to the required standard.

15. Although, the Future Programme does include some provision for 'Net Zero Pilots' across all our social housing estates, Members are reminded that no provision has been made for any future Net Zero Capital Projects. The reason for this, as Members will be aware, is that these projects are still largely unknown and, will only emerge over the next few years, as further research, surveys, and investigations are completed in line with the Housing Net Zero Action Plan. It is likely that Housing Net Zero Capital Projects will be funded from a combination of external grant funding and the City Corporation's Climate Action Strategy Budget.
16. Members will note from the progress report at Appendix 1 that there have been several changes to the status of the various projects since the last meeting of this Sub-Committee. Members are asked to specifically note the following updates:

### **Progress of note on key projects**

#### *H39b – Window Replacements and External Redecorations (Holloway Estate)*

An Issues Report to uplift the project budget by £1,001,176.62 following requirements to amend the planning consent in response to changes in Part F of the Building Regulations was approved at the November 2023 meeting of the Community & Children's Services Committee. The expected date for practical completion remains the end of January 2024.

#### *H39c – Window Replacements and External Redecorations (Southwark Estate - Pakeman, Stopher, Sumner)*

Planning consents for all three blocks have now been secured. The manufacturing process is now clear to begin with a revised programme from the contractor expected shortly. The estimated completion of all works included in this project remains the end of June 2024.

#### *H39d – Window Replacements and External Redecorations (Sydenham Hill)*

An Issues Report to uplift the project budget by £350,450.20 following delays concerning planning and relocation of the site compound was approved at the November 2023 meeting of the Community & Children's Services Committee. The expected date for practical completion is now January 2024.

#### *H39e – Window Replacements and External Redecorations (William Blake Estate)*

As reported previously, the tendered bids received and the planning approvals for this project expired during the temporary hiatus for the Capital Programme Review. A new Gateway 3/4 report is being drafted, presenting options for progressing the proposed Window Replacements at the William Blake Estate. This will be submitted for approval at the planned December meeting of the Community and Children's Services Committee. Re-tendering the work has allowed for extensive consultation with the City's Energy Team, which explored the possibility of securing external funding for any carbon saving measures incorporated into the works.

#### *H39f – Window Replacements and External Redecorations (Windsor House)*

An Issues Report to uplift the project budget by £590,507.97 following the discovery of lead paint, previously unidentified asbestos and more extensive dormer window repairs than originally anticipated was approved at the November 2023 meeting of the Community & Children's Services Committee. The expected date for practical completion is now January 2024.

#### *H40a – Window Refurbishment, Roofing, Ventilation and Heating (Crescent House)*

Work to the pilot project is now complete and open house events have now been held with the various stakeholders. The planning application, which was submitted in the spring, has had more than five objections, and therefore needs to be seen at the meeting of the Planning & Transportation Committee in December. Tender documents have been prepared as far as possible to reduce further delays and await inclusion of any planning conditions before procurement commences. We continue to work closely with residents to move this project forward. Due to the delays with the planning application, work on the wider Crescent House project is unlikely to start before June 2024.

#### *H40b, c, d, e – Window Refurbishment, Roofing and Ventilation (Golden Lane Estate - Remaining Blocks)*

A Gateway 4 Detailed Options Appraisal recommending the repair of existing frames with the installation of vacuum glazing was approved at the November 2023 meeting of the Community & Children's Services Committee, with the budget set at £17,874,000. Design work continues, with applications for Listed Building Consents set to be submitted in April 2024

#### *H45 - York Way Communal Heating*

All works within the residential flats have now been completed, all that remains before practical completion is the redecoration of the plant room.

#### *H46 - Middlesex Street Estate Communal Heating*

The installations within Petticoat Tower are now almost complete; there are currently four remaining leaseholders refusing access. This is in the hands of the leaseholder and legal teams to resolve. Work has now commenced on Petticoat Square. An Issues Report to uplift the project budget by £1,223,570 with a revised estimated practical completion date of June 2024 was approved at the November 2023 meeting of the Community & Children's Services Committee. A further report seeking resolution on the issue of the potential for leaseholder opt-out of the communal heating was also presented and determined at that meeting.

#### *H54 – Fire Door Replacement Programme (Multiple Estates)*

- Lot 2 (Avondale Square Estate)

Installations to the three Point Blocks remain on hold pending the completion of the sprinkler installation programme, the work to install fibre optics and gas mains.

- Lot 3 (Sumner Buildings, William Blake, Dron House, Petticoat Tower communal doors)

Installations in Sumner Buildings are almost complete with just a handful of properties remaining. Electrical adaptations to two properties there are also required before works can conclude. Works at William Blake Estate are also progressing well. We are working collaboratively with the estate team to try and make final appointments. Dron

House site set up is complete with the new doors set to be delivered shortly. Building Control clearance from Tower Hamlets to proceed is still pending, as we now have to work between City and Tower Hamlets Building Control teams following recent regulatory changes.

*H55a - Installation of Sprinklers (Avondale Square Point Blocks)*

The Sprinkler programme across Avondale Point Blocks is now 90% complete. Previous anticipated date of completion was October 2023, but a short delay has been incurred to address outstanding queries raised by Building Control pertaining to sign-off/certification. Anticipated date of completion is now first week of December 2023.

*H55b - Installation of Sprinklers (Petticoat Tower)*

Delivery of the Petticoat Tower programme began w/c 16th October. The contractor is currently mobilising on site with presence available throughout the week. Initial appointments are being booked with residents for in flat surveys. Anticipated date of project completion is currently June 2024. There is an expected increase in costs due to additional work tied to communal boxing approach linking sprinklers and communal heating pipe routes; an Issues Report is in preparation for December 2023 Committees. Other major works programmes remain to be present across Middlesex Street estate, requiring regular monitoring by project officers and CDM principal designer.

17. Members will appreciate, there will always be problems with contracts and projects such as those contained within the Housing Major Works Programme. The last 18 to 24 months have been particularly challenging and, one of the most significant challenges that we continue to face is the huge increase in the cost of construction projects nationally. The Corporation is not immune from these cost increases which, typically, are between 20 and 30%.
18. Members will also recognise that progress with any of the projects included in the Housing Major Works Programme can change at short notice. It is often the case that notable changes in projects will have occurred from the time that reports are written to the time that they are presented to this Sub-Committee. Where appropriate, Officers will provide further updates to Members when presenting this report.

### **Staffing Resources**

19. As highlighted at previous meetings of this Sub-Committee, we continue to have significant problems in recruiting the required staff to help deliver the Major Works Programme. Having had some success in the recent past, we are once again experiencing difficulties in attracting the number and calibre of staff we require. We do still have vacancies within the team and, we continue to try and recruit to these vacant posts as quickly as possible.

### **Appendices**

- Appendix 1: Housing Major Works Programme Progress Report (November 2023)
- Appendix 2: Housing Major Works Programme (Future Programme)



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**GOLDEN LANE ESTATE INVESTMENT PROGRAMME - DELIVERY FORECAST NOVEMBER 2023**

WORKS TYPE	REF	PROJECT	ESTIMATED COST	EXPENDITURE TO DATE	CURRENT STATUS	SLIPPAGE SINCE LAST REPORT	TIMELINE																	
							2023/24				2024/25				2025/26									
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4						
							A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S
INVESTMENT PROGRAMME	H18	Great Arthur House - Replacement windows and cladding	£11,262,538	£10,948,500	works complete																			
	H21	Lift Refurbishment	£1,300,000	£1,002,010	works complete																			
	H16	Golden Lane - Heating Replacement (Phase 1 - All blocks excluding Crescent/Cullum)	£465,000	£415,458	works complete																			
	H5	Decent Homes - Phase II (multiple estate programme)	£625,400	£605,011	works complete																			
	H14	Golden Lane - Concrete Testing & Repairs (all blocks exc. Cullum Welch)	£1,050,000	£975,675	works complete																			
	H15	Cullum Welch House - Concrete Balustrade Replacement & Concrete Repairs	£820,000	£696,700	works complete																			
	H20	Redecorations (Int & Ext - in conjunction with Avondale Square, York Way & Middlesex St Estates)	£416,700	£299,086	works complete																			
	H38	Electrical Testing - Phase II (Tenated flats GLE & MSE)	£441,000	£441,000	works complete																			
	H26	Water Tank Replacement/Repairs (multiple estate programme)	£31,174	£10,000	works complete																			
	H47	Electrical Testing - Phase IV (landlords electrics multiple estates)	£355,567	£229,500	works complete																			
	H60	Electrical Testing - Phase V (tenants electrical testing & smoke alarms - multiple estates)	£6,600	£424	no access flats referred to H. Mgmt																			
	H40a	Window Refurbishment, Roofing, Ventilation & Heating (Crescent House)	£11,958,695	£600,000	planning approval pending						PILOT FLAT					WORKS								
	H40b	Window Refurbishment, Roofing & Ventilation (Cullum Welch House)	£3,270,448	£53,000	design																			
	H40c	Window Refurbishment, Roofing & Ventilation (Great Arthur House)	£1,281,482	£21,000	design																			
	H40d	Window Refurbishment, Roofing & Ventilation (Stanley Cohen House)	£1,668,596	£27,000	design																			
	H40e	Window Refurbishment, Roofing & Ventilation (Maisonette Blocks)	£11,653,474	£191,700	design																			
	H41	Great Arthur House - Front Door Replacement/Compartmentation	£675,000	£60,536	design (with sprinklers)																			
	H54	Fire Door Replacement Programme (Lot 5 - GLE)	£1,160,000	£4,800	Lot 5 of 5. Lots 1,2 & 3 in delivery.																			
	H55c	Installation of Sprinklers (Great Arthur House)	TBC	£130,000	contract with UL withdrawn	TBC																		
H61	Golden Lane Area Lighting & Accessibility	£500,000	£450	on hold - Capital Programme Review	TBC																			
TOTAL			£48,941,674	£16,711,850																				

**MIDDLESEX STREET ESTATE INVESTMENT PROGRAMME - DELIVERY FORECAST NOVEMBER 2023**

WORKS TYPE	REF	PROJECT	ESTIMATED COST	EXPENDITURE TO DATE	CURRENT STATUS	SLIPPAGE SINCE LAST REPORT	TIMELINE																
							2023/24				2024/25				2025/26								
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4					
							A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A
INVESTMENT PROGRAMME	H22	Concrete Testing & Repairs	£160,000	£170,099	works complete																		
	H20	Redecorations (Int & Ext - in conjunction with Avondale Square, Golden Lane, York Way Estates)	£222,314	£199,069	works complete																		
	H38	Electrical Testing - Phase IIa (Tenated flats GLE & MSE)	£440,000	£421,000	works complete																		
	H24	Petticoat Tower - balcony doors and windows	£450,000	£346,050	works complete																		
	H23	MSE Lift Refurbishment	£1,555,000	£1,277,580	works complete																		
	H26	Water Tank Replacement/Repairs (multiple estate programme)	£14,003	£560	works complete																		
	H46	Communal Heating (inc Cold Water Distribution)	£4,349,389	£3,415,220	on site																		
	H42	Petticoat Tower - Front Door Replacement	£326,429	£298,471	works complete																		
	H25	Petticoat Tower stairwell	£435,000	£427,248	works complete																		
	H12	Electrical Remedial Works (non-urgent)	£385,890	£363,825	works complete																		
	H54	Fire Door Replacement Programme (Lot 3 - inc Petticoat Tower communal doors)	£180,000	£4,800	G5 approved, contracts exchanged						LOT 3 BLOCKS												
	H58	Electrical Remedial Works (Phase IIb - Landlords electrics)	£368,800	£140,000	works complete																		
	H55b	Installation of Sprinklers (Petticoat Tower)	£1,324,554	£44,128	on site																		
	H53	Play and Ball Games Area Refurbishment (multiple estate programme)	£41,732	£38,538	works complete																		
TOTAL			£10,253,111	£7,146,588																			

- works delivery baseline (as forecast November 2017)
- works on site/complete
- works programmed (current forecast)
- testing/preparatory/offsite works
- programme slippage from previous report (length of arrow denotes length of delay)
- ← programme brought forward from previous report (length of arrow denotes extent)
- projects added to the programme post launch

AVONDALE SQUARE ESTATE INVESTMENT PROGRAMME - DELIVERY FORECAST NOVEMBER 2023

WORKS TYPE	REF	PROJECT	ESTIMATED COST	EXPENDITURE TO DATE	CURRENT STATUS	SLIPPAGE SINCE LAST REPORT	TIMELINE																													
							2023/24				2024/25				2025/26																					
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4														
A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	
INVESTMENT PROGRAMME	H6	Decent Homes Avondale - Phase II	£392,780	£392,780	works complete																															
	H20	Redecorations (multiple estate programme)	£607,150	£571,252	works complete																															
	H43	Decent Homes Harman Close	£980,000	£972,476	practical completion																															
	H1	Avondale Square - Window Overhaul	£453,440	£417,000	works complete																															
	H26	Water Tank Replacement/Repairs (multiple estate programme)	£92,104	£36,000	works complete																															
	H48	Electrical Testing - Phase III (tenanted flats multiple estates)	£555,266	£467,000	works complete																															
	H47	Electrical Testing - Phase IV (landlords electrics multiple estates)	£355,567	£229,500	works complete																															
	H54	Fire Door Replacement Programme (Lot 2 - Avondale Square Estate)	£2,790,000	£1,164,501	on site																															
	H55a	Installation of Sprinklers (Point Blocks)	£3,548,027	£2,556,913	on site																															
	H52	Avondale Communal & Emergency Lighting	£337,000	£336,636	works complete																															
	H53	Play and Ball Games Area Refurbishment (multiple estate programme)	£138,000	£126,112	works complete																															
	H60	Electrical Testing - Phase V (tenants electrical testing & smoke alarms - multiple estates)	£287,100	£110,321	no access flats referred to H. Mgmt																															
	H59	George Elliston & Eric Wilkins Refurbishment	£3,700,000	£130	design	TBC																														
TOTAL			£14,236,434	£7,380,621																																

SOUTHWARK/WILLIAM BLAKE ESTATES INVESTMENT PROGRAMME - DELIVERY FORECAST NOVEMBER 2023

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WORKS TYPE	REF	PROJECT	ESTIMATED COST	EXPENDITURE TO DATE	CURRENT STATUS	SLIPPAGE SINCE LAST REPORT	TIMELINE																												
							2023/24				2024/25				2025/26																				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4													
A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H2	CCTV (William Blake)	£23,301	£16,900	works complete																														
	H5	Decent Homes - Phase II (Southwark as part of multiple estate programme)	£1,270,000	£762,240	works complete																														
	H26	Water Tank Replacement/Repairs (multiple estate programme)	£67,900	£25,000	works complete																														
	H10	Door Entry (William Blake in conjunction with Dron House)	£268,500	£212,000	works complete																														
	H56	Re-Roofing at Blake House (William Blake Estate)	£396,000	£393,000	works complete																														
	H48	Electrical Testing - Phase III (tenanted flats multiple estates)	£555,266	£467,000	works complete																														
	H47	Electrical Testing - Phase IV (landlords electrics multiple estates)	£355,567	£229,500	works complete																														
	H39c	Window Replacements & External Redecorations (Pakeman, Stopher & Sumner)	£4,294,565	£1,794,338	window surveys & redecoration																														
	H39e	Window Replacements & External Redecorations (William Blake)	£3,000,000	£57,500	delayed due to Capital Prog. Review																														
	H54	Fire Door Replacement Programme (Lot 3 - Sumner & W. Blake, Lot 4 - Southwark)	£1,454,000	£526,209	Lot 3 contracts exchanged																														
	H60	Electrical Testing - Phase V (tenants electrical testing & smoke alarms - multiple estates)	£146,850	£48,767	no access flats referred to H. Mgmt																														
	H50	Southwark Estate Concrete Testing & Repair	£1,500,000	£70,332	on hold - Capital Programme Review																														
	TOTAL			£13,331,949	£4,602,786																														

HOLLOWAY ESTATE INVESTMENT PROGRAMME - DELIVERY FORECAST NOVEMBER 2023

WORKS TYPE	REF	PROJECT	ESTIMATED COST	EXPENDITURE TO DATE	CURRENT STATUS	SLIPPAGE SINCE LAST REPORT	TIMELINE																												
							2023/24				2024/25				2025/26																				
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4													
A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H36	Electrical Rewire (Tenanted Flats)	£225,000	£205,000	works complete																														
	H37	Electrical Rewire (Landlords)	£385,465	£373,000	works complete																														
	H26	Water Tank Replacement/Repairs (multiple estate programme)	£16,722	£3,505	works complete																														
	H39b	Window Replacements & External Redecorations (Holloway)	£4,681,409	£2,618,750	on site																														
	H60	Electrical Testing - Phase V (tenants electrical testing & smoke alarms - multiple estates)	£9,900	£8,383	no access flats referred to H. Mgmt																														
H54	Fire Door Replacement Programme (Lot 1 - Holloway & York Way)	£637,988	£519,527	works complete																															
TOTAL			£5,956,484	£3,728,165																															

- █ works delivery baseline (as forecast November 2017)
- █ works on site/complete
- █ works programmed (current forecast)
- █ testing/preparatory/offsite works
- programme slippage from previous report (length of arrow denotes length of delay)
- ← programme brought forward from previous report (length of arrow denotes extent)
- █ projects added to the programme post launch

**YORK WAY ESTATE INVESTMENT PROGRAMME - DELIVERY FORECAST NOVEMBER 2023**

WORKS TYPE	REF	PROJECT	ESTIMATED COST	EXPENDITURE TO DATE	CURRENT STATUS	SLIPPAGE SINCE LAST REPORT	TIMELINE																
							2023/24				2024/25				2025/26								
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4					
A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H5	Decent Homes - Phase II (multiple estate programme)	£608,000	£574,297	works complete																		
	H20	Redecorations (multiple estate programme)	£596,000	£541,000	works complete																		
	H26	Water Tank Replacement/Repairs (multiple estate programme)	£130,653	£49,000	works complete																		
	H48	Electrical Testing - Phase III (tenanted flats multiple estates)	£555,266	£467,000	works complete																		
	H47	Electrical Testing - Phase IV (landlords electrics multiple estates)	£355,567	£229,500	works complete																		
	H45	Communal Heating (inc Cold Water Distribution)	£3,800,190	£3,515,556	on site																		
	H60	Electrical Testing - Phase V (tenants electrical testing & smoke alarms - multiple estates)	£11,550	£2,170	no access flats referred to H. Mgmt																		
	H54	Fire Door Replacement Programme (Lot 1 - Holloway & York Way)	£1,060,226	£997,195	works complete																		
TOTAL			£7,117,452	£6,375,718																			

**SYDENHAM HILL ESTATE INVESTMENT PROGRAMME - DELIVERY FORECAST NOVEMBER 2023**

WORKS TYPE	REF	PROJECT	ESTIMATED COST	EXPENDITURE TO DATE	CURRENT STATUS	SLIPPAGE SINCE LAST REPORT	TIMELINE																
							2023/24				2024/25				2025/26								
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4					
A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H5	Decent Homes - Phase II (multiple estate programme)	£173,315	£46,472	works complete																		
	H48	Electrical Testing - Phase III (tenanted flats multiple estates)	£555,266	£467,000	works complete																		
	H47	Electrical Testing - Phase IV (landlords electrics multiple estates)	£355,567	£229,500	works complete																		
	H39d	Window Replacements & Extenal Redecoration (Sydenham Hill)	£1,664,370	£1,202,438	on site																		
	H60	Electrical Testing - Phase V (tenants electrical testing & smoke alarms - multiple estates)	£8,250	£610	no access flats referred to H. Mgmt																		
		H54	Fire Door Replacement Programme (Lot 4 - inc Sydenham)	£192,500	£4,800	procurement																	
TOTAL			£2,949,268	£1,950,820																			

**SMALL ESTATES (DRON, WINDSOR, ISLEDEN, COLA, GRESHAM) INVESTMENT PROGRAMME - DELIVERY FORECAST NOVEMBER 2023**

WORKS TYPE	REF	PROJECT	ESTIMATED COST	EXPENDITURE TO DATE	CURRENT STATUS	SLIPPAGE SINCE LAST REPORT	TIMELINE																
							2023/24				2024/25				2025/26								
							Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4					
A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H5	Decent Homes - Phase II (Dron & Windsor as part of multiple estate programme)	£686,216	£451,412	works complete																		
	H26	Water Tank Replacement/Repairs (multiple estate programme)	£15,810	£15,810	works complete																		
	H48	Electrical Testing - Phase III (tenanted flats multiple estates)	£555,266	£372,000	works complete																		
	H10	Door Entry (Dron House in conjunction with William Blake)	£120,000	£120,000	works complete																		
		H56	Re-Roofing at Dron House	£404,000	£363,000	works complete																	
	H47	Electrical Testing - Phase IV (landlords electrics multiple estates)	£355,567	£229,500	works complete																		
	H39a	Window Replacements & External Redecoration (Dron)	£1,659,146	£1,591,080	works complete																		
	H39f	Window Replacements & External Redecoration (Windsor)	£2,260,939	£1,612,395	on site																		
	H60	Electrical Testing - Phase V (tenants electrical testing & smoke alarms - multiple estates)	£6,600	£718	no access flats referred to H. Mgmt																		
		H54	Fire Door Replacement Programme (Lot 3 - inc Dron, Lot 4 - inc Windsor, Isleden)	£890,000	£12,251	on site																	
		H53	Play and Ball Games Area Refurbishment (multiple estate programme)	£46,302	£42,880	works complete																	
	H44	COLA & Gresham Refurbishment	£838,669	£643,575	final snagging issues being resolved																		
TOTAL			£7,838,515	£5,454,621																			

**TOTAL PLANNED EXPENDITURE (ALL ESTATES)**

	TOTAL PLANNED	SPENT TO DATE
Golden Lane Estate	£48,941,674	£16,711,850
Middlesex Street Estate	£10,253,111	£7,146,588
Avondale Square Estate	£14,236,434	£7,380,621
Southwark/William Blake Estates	£13,331,949	£4,602,786
Holloway Estate	£5,956,484	£3,728,165
York Way Estate	£7,117,452	£6,375,718
Sydenham Hill Estate	£2,949,268	£1,950,820
Small Estates	£7,838,515	£5,454,621
<b>TOTAL</b>	<b>£110,624,887</b>	<b>£53,351,169</b>

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AVONDALE SQUARE ESTATE INVESTMENT PROGRAMME - MAJOR WORKS DELIVERY FORECAST (FUTURE PROGRAMME)

WORKS TYPE	REF	PROJECT	SCOPE	ESTIMATED COST	TIMELINE																																			
					YEAR 1 (2023/24)				YEAR 2 (2024/25)				YEAR 3 (2025/26)				YEAR 4 (2026/27)				YEAR 5 (2027/28)																			
					Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4																
					A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H54	Fire Door Replacement Programme	Residential front doors, communal fire doors (all blocks excluding Harman & Twelveacres)	£2,843,000																																				
	H55	Installation of Sprinklers	Point blocks only (as part of wider programme)	£3,550,000																																				
	H59	George Elliston & Eric Wilkins Refurbishment	inc lift refurb (£420k - GE 2 lifts at £280k, EW 1 lift at £140k, plus fees - est £10k per block)	£3,700,000																																				
		Landlords Electrical Remedial Works (Multiple Estate Programme)	Programme of works to emerge from Phase IV testing currently ongoing	TBC																																				
		Net Zero Retrofit Pilots		£100,000																																				
		Lift Refurbishment (Harman Close)	B&Y est £220k plus fees	£250,000																																				
		Boiler Replacement Programme (Multiple Estate Programme)	244 Boilers, 156 Radiator Systems (subject to Net Zero strategy)	£730,000																																				
		Avondale Estate Concrete Testing & Remedial Works (Capital Works)	include balconies, soffits & associated balustrades	£600,000																																				
		Road Markings & Signage Renewal (Multiple Estate Programme)	subject to survey	£30,000																																				
		Flat Roof Renewals & Insulation		£2,000,000																																				
		Play Area Replacement (Multiple Estate Programme)	Toddlers Sunken Play Area	£45,000																																				
		Avondale paving & communal walkway refurbishment	subject to survey	£100,000																																				
		CCTV Programme (Multiple Estate Programme)	Avondale	£150,000																																				
		Tenants Electrical Testing	5 year cyclical works	£427,200																																				
		Wooden Shed & Outbuildings Door/Gate Replacement	subject to survey	£25,000																																				
		Decent Homes (Multiple Estate Programme)	122 Kitchens (54 prior refusals/no access), 74 Bathrooms (38 prior refusals/no access)	£795,000																																				
		Communal Flooring (Multiple Estate Programme)		£60,000																																				
	Avondale Square Estate Total				£15,405,200	£6,393,000				£1,850,000				£4,613,333				£1,848,033				£700,833																		

SOUTHWARK ESTATE INVESTMENT PROGRAMME - MAJOR WORKS DELIVERY FORECAST (FUTURE PROGRAMME)

WORKS TYPE	REF	PROJECT	SCOPE	ESTIMATED COST	TIMELINE																																			
					YEAR 1 (2023/24)				YEAR 2 (2024/25)				YEAR 3 (2025/26)				YEAR 4 (2026/27)				YEAR 5 (2027/28)																			
					Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4																
					A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H39	Window Replacements & External Redecoration	Pakeman, Stopher & Sumner only	£5,900,000																																				
	H4	Fire Door Replacement Programme	Residential front doors, communal fire doors	£1,000,000																																				
	H5	Southwark Estate Concrete Testing & Repair	To follow window replacements	£1,500,000																																				
		Landlords Electrical Remedial Works (Multiple Estate Programme)	Programme of works to emerge from Phase IV testing currently ongoing, inc street lighting	TBC																																				
		Net Zero Retrofit Pilots		£100,000																																				
		Flat Roof Renewals & Insulation	All blocks (combine with William Blake partial)	£2,000,000																																				
		Boiler Replacement Programme (Multiple Estate Programme)	141 Boilers, 153 Radiator Systems (subject to Net Zero strategy)	£425,000																																				
		Road Markings & Signage Renewal (Multiple Estate Programme)	subject to survey	£30,000																																				
		Internal/External Redecoration (Multiple Estate Programme)	cyclical works - subject to survey	£450,000																																				
		Door Entry System Replacement (MSE & partial Southwark)	Bazeley , Markstone, Great Suffolk St inc fob system hardware renewal all blocks	£200,000																																				
		Play Area Replacement (Multiple Estate Programme)	Sumner Buildings: Ball Games Area & Play Area	£90,000																																				
		CCTV Programme (Multiple Estate Programme)		£200,000																																				
		Tenants Electrical Testing	5 year cyclical works	£187,200																																				
		Decent Homes (Multiple Estate Programme)	101 Kitchens (44 prior refusals/no access), 76 Bathrooms (25 prior refusals/no access)	£695,000																																				
		Communal Flooring (Multiple Estate Programme)		£35,000																																				
	Southwark Estate Total				£12,812,200	£7,650,000				£750,000				£2,511,667				£1,151,367				£749,167																		





**SYDENHAM HILL ESTATE INVESTMENT PROGRAMME - MAJOR WORKS DELIVERY FORECAST (FUTURE PROGRAMME)**

WORKS TYPE	REF	PROJECT	SCOPE	ESTIMATED COST	TIMELINE																																																											
					YEAR 1 (2023/24)				YEAR 2 (2024/25)				YEAR 3 (2025/26)				YEAR 4 (2026/27)				YEAR 5 (2027/28)																																											
					Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4																																								
					A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H39	Window Replacements & External Redecoration		£1,217,610																																																												
	H54	Fire Door Replacement Programme	Residential front doors, communal fire doors	£200,000																																																												
		Landlords Electrical Remedial Works (Multiple Estate Programme)	Programme of works to emerge from Phase IV testing currently ongoing, inc street lighting	TBC																																																												
		Net Zero Retrofit Pilots		£50,000																																																												
		Boiler Replacement Programme (Multiple Estate Programme)	26 Boilers, 13 Radiator Systems (subject to Net Zero strategy)	£78,000																																																												
		Road Markings & Signage Renewal (Multiple Estate Programme)	subject to survey	£30,000																																																												
		Internal/External Redecoration (Multiple Estate Programme)	cyclical works - subject to survey	£250,000																																																												
		Play Area Replacement (Multiple Estate Programme)	Ball Games Area	£45,000																																																												
		CCTV Programme (Multiple Estate Programme)		£35,000																																																												
		Tenants Electrical Testing		£27,200																																																												
	Decent Homes (Multiple Estate Programme)	17 Kitchens (4 prior refusals/no access), 11 Bathrooms (4 prior refusals/no access)	£112,500																																																													
	Communal Flooring (Multiple Estate Programme)		£10,000																																																													
Sydenham Hill Estate Total				£2,055,310	£1,317,610				£100,000				£96,000				£324,450				£217,250																																											

**SMALL ESTATES (DRON, WINDSOR, ISLEDEN) INVESTMENT PROGRAMME - MAJOR WORKS DELIVERY FORECAST (FUTURE PROGRAMME)**

WORKS TYPE	REF	PROJECT	SCOPE	ESTIMATED COST	TIMELINE																																																											
					YEAR 1 (2023/24)				YEAR 2 (2024/25)				YEAR 3 (2025/26)				YEAR 4 (2026/27)				YEAR 5 (2027/28)																																											
					Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4																																								
					A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H39	Window Replacements & External Redecoration	Windsor House	£1,912,500																																																												
	H54	Fire Door Replacement Programme	Residential front doors, communal fire doors	£720,000																																																												
		Landlords Electrical Remedial Works (Multiple Estate Programme)	Programme of works to emerge from Phase IV testing currently ongoing, inc street lighting	TBC																																																												
		Net Zero Retrofit Pilots		£50,000																																																												
		Boiler Replacement Programme (Multiple Estate Programme)	73 Boilers, 70 Radiator Systems (subject to Net Zero strategy)	£220,000																																																												
		Isleden - Domestic heat exchanger & control unit renewal		£150,000																																																												
		Road Markings & Signage Renewal (Multiple Estate Programme)	subject to survey	£30,000																																																												
		Internal/External Redecoration (Multiple Estate Programme)	cyclical works - subject to survey	£350,000																																																												
		Flat Roof Renewal & Insulation (Windsor House)		£400,000																																																												
		CCTV Programme (Multiple Estate Programme)	Dron (£27,000), Windsor (£34,000), Isleden (£31,000)	£92,000																																																												
	Tenants Electrical Testing		£150,400																																																													
	Decent Homes (Multiple Estate Programme)	109 Kitchens (19 prior refusals/no access), 91 Bathrooms (10 prior refusals/no access)	£772,500																																																													
	Communal Flooring (Multiple Estate Programme)		£15,000																																																													
Small Estates Total				£4,862,400	£2,632,500				£0				£648,333				£931,983				£649,583																																											

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**SPITALFIELDS INVESTMENT PROGRAMME - MAJOR WORKS DELIVERY FORECAST (FUTURE PROGRAMME)**

WORKS TYPE	REF	PROJECT	SCOPE	ESTIMATED COST	TIMELINE																																															
					YEAR 1 (2023/24)				YEAR 2 (2024/25)				YEAR 3 (2025/26)				YEAR 4 (2026/27)				YEAR 5 (2027/28)																															
					Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4																												
					A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M
INVESTMENT PROGRAMME	H54	Fire Door Replacement Programme	Residential front doors, communal fire doors	£136,000																																																
		Landlords Electrical Remedial Works (Multiple Estate Programme)	Programme of works to emerge from Phase IV testing currently ongoing, inc street lighting	TBC																																																
		Net Zero Retrofit Pilots		£20,000																																																
		Boiler Replacement Programme (Multiple Estate Programme)	8 Boilers (subject to Net Zero strategy)	£24,000																																																
		Internal/External Redecoration (Multiple Estate Programme)	cyclical works - subject to survey	£100,000																																																
		Tenants Electrical Testing		£11,200																																																
		Decent Homes (Multiple Estate Programme)	13 Kitchens (0 prior refusals/no access), 11 Bathrooms (0 prior refusals/no access)	£92,500																																																
	Communal Flooring (Multiple Estate Programme)		£5,000																																																	
Spitalfields Total				£388,700	£136,000				£0				£18,000				£125,450				£109,250																															

COLAT INVESTMENT PROGRAMME - MAJOR WORKS DELIVERY FORECAST (FUTURE PROGRAMME)

WORKS TYPE	REF	PROJECT	SCOPE	ESTIMATED COST	TIMELINE																																										
					YEAR 1 (2023/24)				YEAR 2 (2024/25)				YEAR 3 (2025/26)				YEAR 4 (2026/27)				YEAR 5 (2027/28)																										
					Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4																							
					A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O
INVESTMENT PROGRAMME		Net Zero Retrofit Pilots		£50,000																																											
		Boiler Replacement Programme (Multiple Estate Programme)	18 in 2022, 27 in 2023, 1 in 2024 (subject to Net Zero strategy)	£138,000																																											
		CCTV Programme (Multiple Estate Programme)		£20,000																																											
		Tenants Electrical Testing		£42,400																																											
		<b>COLAT Total</b>		<b>£250,400</b>																																											

- works programmed (current forecast)
- testing/pre contract surveys etc
- project carried over from previous programme

COMBINED INVESTMENT PROGRAMME		ESTIMATED COST	TIMELINE				
			YEAR 1	YEAR 2	YEAR 3	YEAR 4	YEAR 5
<b>5 Year Programme Estimated total</b>		<b>£93,526,160</b>	<b>£36,768,560</b>	<b>£25,722,800</b>	<b>£10,710,667</b>	<b>£15,135,967</b>	<b>£5,170,667</b>
Potential cost variance +25%		£116,907,700	£45,960,700	£32,153,500	£13,388,333	£18,919,958	£6,463,333
Potential cost variance -25%		£70,144,620	£27,576,420	£19,292,100	£8,033,000	£11,351,975	£3,878,000

EXCLUDING TBC SUMS

Projects carried over from previous programme	£63,841,360
New project value (unfunded)	£29,684,800
Potential cost variance +25%	£37,106,000
Potential cost variance -25%	£22,263,600

EXCLUDING TBC SUMS

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<b>Committee:</b> Housing Management and Almshouses Sub-Committee	<b>Dated:</b> 29 November 2023
<b>Subject:</b> Tenant Satisfaction Survey 2023-24	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1, 4
<b>Does this proposal require extra revenue and/or capital spending?</b>	Y/N
<b>If so, how much?</b>	£
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	Y/N
<b>Report of:</b> Executive Director of Community and Children's Services	<b>For Information</b>
<b>Report author:</b> Liam Gillespie, Head of Housing Management and Liane Coopey, Housing Business Support Manager	

## Summary

As part of a new regulatory regime for social housing which came into effect on 1 April 2023, social landlords are now required to submit annual returns against a set of Tenant Satisfaction Measures (TSMs), with the first submission to the Regulator for Social Housing due in April 2024. A report providing details of the TSM regime was submitted to the Community and Children's Services Committee in July 2023.

This report updates Members on the planned survey of the City Corporation's tenants, which is scheduled for November 2023.

## Recommendation

Members are asked to:

- Note the report.

## Main Report

### Background

1. The Regulator for Social Housing (RSH) introduced a suite of Tenant Satisfaction Measures (TSMs) as part of the overhaul of social housing regulation arising from the Social Housing White Paper, published in 2020.
2. Following substantial public consultation, a final set of TSMs was created and the first regulatory return is due in April 2024. This applies to all social landlords with 1,000 or more homes under their management.

3. There are 22 TSMs, covering the following areas:
  - Building safety
  - Antisocial behaviour
  - Repairs and Decent Homes Standards
  - Complaints handling
  - Respectful and helpful engagement
4. Ten of the TSMs are measured by landlords directly, from data already held by them. The remaining twelve will be measured through an annual Tenant Perception Survey. For ease of reference, the TSMs are shown at **Appendix One**.
5. The regulatory obligation to complete the survey and statistical return applies to residents living in:
  - ‘Low-Cost Rental Accommodation’: in our case, secure tenants of general needs and sheltered housing accommodation (1,860 households)
  - ‘Low-Cost Home Ownership’: homes which are managed by a social landlord but not fully owned by the tenant, for example shared ownership properties (this is not applicable in the City Corporation’s case)
6. Members may wish to note that there is no requirement to survey long leaseholders and submit leaseholder satisfaction data to the RSH. However, in common with many landlords, we will continue to include leaseholders in the survey to identify areas of concern and inform service improvements.
7. Landlords have the freedom to design and conduct their surveys as they wish, provided they meet the requirements specified by the RSH in their guidance. Landlords may carry out a single annual survey, or monthly/quarterly ‘tracker’ surveys. Indications are that most landlords will conduct an annual survey; a poll by *Inside Housing* indicated that 60% of respondent landlords were intending to carry out a single survey for the first return<sup>1</sup>.
8. The wording of the TSM questions is specified by the RSH and the response options are also stipulated. Additional questions may also be asked at the landlord’s discretion but will not form part of the regulatory submission.
9. Detailed guidance has been issued by the RSH on the conduct of the survey. The RSH has made it clear that landlords are expected to obtain sufficient survey returns to provide statistically significant data, to provide high levels of assurance that the results are representative of the tenant population and their satisfaction with their landlord’s services.
10. Landlords must also ensure that their returns are weighted appropriately to give an accurate reflection of tenant satisfaction across different tenures. For instance, it is known that satisfaction among tenants in sheltered housing tends to be much

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<sup>1</sup> *Social landlords reveal approach to carrying out surveys for tenant satisfaction measures*, Inside Housing, 2.5.2023.

higher than those living in general needs homes. The RSH expects landlords to be able to demonstrate that their satisfaction figures are weighted appropriately to be representative of the tenures they manage. For example, surveying only sheltered housing residents and presenting the results as representative of the whole tenant population would not be acceptable.

11. Given the need to reach a minimum number of tenants and ensure that people have more of a choice in how they participate, many landlords are planning to carry out online and telephone surveys.
12. To ensure the survey is conducted as impartially as possible, many housing providers intend to use independent market research companies to carry out their surveys. This reduces the possibility of bias or undue influence and encourages respondents to be as open as possible in their answers, in addition to providing assurance around obtaining adequate numbers of responses.

### **Current Position**

13. The Housing Division has appointed Acuity Research and Practice Ltd, a market research company specialising in the housing sector, to carry out the Tenant Perception Survey on its behalf. The timetable for the survey campaign is 13 – 25 November 2023, however the survey window will be extended if the minimum number of survey returns required is not obtained in that time.
14. While the main purpose of the Tenant Perception Survey is to obtain reliable data on *tenant* satisfaction, long leaseholders will also be surveyed as in previous years, though we are not required to submit this information to the RSH.
15. To meet the requirements of the RSH and ensure that responses are as representative as possible, a target has been set to complete 320 surveys with social tenants.
16. These figures have been calculated by Acuity in accordance with the RSH's guidance on the completion of the survey, to ensure statistical significance and provide the necessary level of confidence that the responses provide a true reflection of satisfaction levels.
17. For the first time, in addition to an online survey, we will use telephone surveys to gather responses. There are several reasons for this:
  - To increase the response rate when compared to online-only or online/paper surveys as employed in previous years
  - To address obstacles to participation, for instance among households with no access to digital media, literacy issues or language barriers
  - Telephone surveys are much more time and cost effective
18. Once the survey is complete, Acuity will provide a full analytical report across the twelve TSMs and this will be shared with Members and residents early in 2024.

19. Further information on Acuity, and how the survey will be delivered, is shown at **Appendix Two**.

### **Data Protection and Confidentiality**

20. Acuity adheres to the Market Research Society's Code of Conduct, meaning that respondents can be assured that the survey will be conducted in a professional and ethical manner. The organisation also meets our data protection and security requirements for commissioned services.

21. This also complies with the requirements of the RSH for the conduct of tenant surveys by external providers.

### **Corporate & Strategic Implications**

#### **Strategic implications**

The completion of the annual survey will enable us to satisfy regulatory requirements. The data collected through the survey will be used to inform service improvements as part of the ongoing review of strategic aims for housing management.

#### **Financial implications**

The cost of completing the survey has already been accounted for as part of local risk budgets for 2023/4.

#### **Resource implications**

The compiling of data and the completion of the regulatory return will be handled by the Housing Division and colleagues within DCCS. The management information required to be submitted has been collected monthly as part of the new housing KPI dashboard, which is jointly maintained by the Housing Division and DCCS performance analysts.

#### **Legal implications**

None.

#### **Risk implications**

None.

#### **Equalities implications**

There are positive equalities implications in that the methodology of the survey will enable wider participation among groups with protected characteristics, due to the use of telephone surveys. This approach will enable a wider and more representative set of responses compared with previous online/paper surveys. The results of the survey are more likely to reflect the priorities and needs of a wider range of residents than in previous years.

#### **Climate implications**

None.

#### **Security implications**

None.



## **Conclusion**

22. The Housing Division is due to conduct its first Tenant Perception Survey under the new Tenant Satisfaction Measures regime, the results of which will be reported to the Regulator for Social Housing in April 2024.

23. An independent market research organisation, Acuity Research and Practice Ltd, has been appointed to carry out the survey on the City Corporation's behalf. The survey will be conducted online and by telephone in November 2023.

## **Appendices**

- Appendix One – Tenant Satisfaction Measures and Questions
- Appendix Two – Further detail on conduct of survey

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**Tenant Satisfaction Survey**  
**Question Requirements**

*Please note: only those measures with a “TP” reference number (shaded grey) will form part of the Tenant Satisfaction Survey. The remaining measures will be reported using landlord data.*

<b>Overall satisfaction</b>	<b>TP01: Overall satisfaction</b>	Taking everything into account, how satisfied or dissatisfied are you with the service provided by your landlord? This measure will be based on the percentage of tenants who say they are satisfied.
<b>Keeping properties in good repair</b>	<b>TP02: Satisfaction with repairs</b>	Has your landlord carried out a repair to your home in the last 12 months? If yes, how satisfied or dissatisfied are you with the overall repairs service from your landlord over the last 12 months?
	<b>TP03: Satisfaction with time taken to complete most recent repair</b>	Has your landlord carried out a repair to your home in the last 12 months? If yes, how satisfied or dissatisfied are you with the time taken to complete your most recent repair after you reported it?
	<b>TP04: Satisfaction that the home is well-maintained</b>	How satisfied or dissatisfied are you that your landlord provides a home that is well-maintained?

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**APPENDIX ONE**

	<b>RP01: Homes that do not meet the Decent Homes Standard</b>	Measured by landlords' management information This measure will be based on the percentage of a landlord's homes that do not meet the Decent Homes Standard. This is a government document describing conditions that social homes should meet.
	<b>RP02: Repairs completed within target timescale</b>	Measured by landlords' management information This measure will be based on the percentage of repairs the landlord has done within the target time they have set for themselves. As part of this measure, landlords will have to make these target times public. This will measure both emergency and non-emergency repairs requested by tenants. Repairs planned by the landlord will not be included.
<b>Maintaining building safety</b>	<b>TP05: Satisfaction that the home is safe</b>	Thinking about the condition of the property or building you live in, how satisfied or dissatisfied are you that your landlord provides a home that is safe?
<b>Safety checks</b>	<b>BS01: Gas safety checks</b>	Measured by landlords' management information This measure will be based on the percentage of homes that have had all the necessary gas safety checks.
	<b>BS02: Fire safety checks</b>	Measured by landlords' management information This measure will be based on the percentage of homes in buildings that have had all the necessary fire risk assessments.
	<b>BS03: Asbestos safety checks</b>	Measured by landlords' management information This measure will be based on the percentage of homes in buildings that have had all the necessary asbestos management surveys or re-inspections.

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**APPENDIX ONE**

	<b>BS04: Water safety checks</b>	Measured by landlords' management information This measure will be based on the percentage of homes that have had all the necessary legionella risk assessments. Legionella is a bacterium that can make people ill if it gets into water supplies.
	<b>BS05: Lift safety checks</b>	Measured by landlords' management information This measure will be based on the percentage of homes in buildings where the communal passenger lifts have had all the necessary safety checks.
<b>Respectful and helpful engagement</b>	<b>TP06: Satisfaction that the landlord listens to tenant views and acts upon them</b>	How satisfied or dissatisfied are you that your landlord listens to your views and acts upon them?
	<b>TP07: Satisfaction that the landlord keeps tenants informed about things that matter to them</b>	How satisfied or dissatisfied are you that your landlord keeps you informed about things that matter to you?
	<b>TP08: Agreement that the landlord treats tenants fairly and with respect</b>	To what extent do you agree or disagree with the following? "My landlord treats me fairly and with respect."
<b>Effective handling of complaints</b>	<b>TP09: Satisfaction with the landlord's approach to handling of complaints</b>	Have you made a complaint to your landlord in the last 12 months? If yes, how satisfied or dissatisfied are you with your landlord's approach to complaints handling?

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**APPENDIX ONE**

	<b>CH01: Complaints relative to the size of the landlord</b>	Measured by landlords' management information This measure will be based on the number of complaints the landlord receives for each 1,000 homes they own.
	<b>CH02: Complaints responded to within Complaint Handling Code timescales</b>	Measured by landlords' management information.  This measure will be based on the percentage of complaints the landlord responds to within the times set by the Housing Ombudsman's Complaint Handling Code. All social housing landlords have to follow this Code.
<b>Responsible neighbourhood management</b>	<b>TP10: Satisfaction that the landlord keeps communal areas clean and well-maintained</b>	Do you live in a building with communal areas, either inside or outside, that your landlord is responsible for maintaining? If yes, how satisfied or dissatisfied are you that your landlord keeps these communal areas clean and well-maintained?
	<b>TP11: Satisfaction that the landlord makes a positive contribution to neighbourhoods</b>	How satisfied or dissatisfied are you that your landlord makes a positive contribution to your neighbourhood?
	<b>TP12: Satisfaction with the landlord's approach to handling anti-social behaviour</b>	How satisfied or dissatisfied are you with your landlord's approach to handling anti-social behaviour?
	<b>NM01: Anti-social behaviour cases relative to the size of the landlord</b>	Measured by landlords' management information This measure will be based on the number of anti-social behaviour cases opened for each 1,000 homes the landlord owns, including the number of cases that involve hate incidents.

# Tenant Satisfaction Measures Survey



## What survey?

The City of London Corporation have commissioned Acuity, a market research company who specialise in the social housing sector, to carry out a series of telephone surveys with their residents. The survey is a general satisfaction survey (perception survey) asking residents what they think about their home and the services provided by the Corporation. The questions are based on the new Tenant Satisfaction Measures (TSMs) introduced by the Regulator of Social Housing from April this year and the results for tenants will be reported back to the Regulator.

## Who are Acuity?

Acuity Research & Practice (Acuity) provide resident satisfaction surveys and benchmarking services, helping housing providers to improve services and engage with their residents through an understanding of satisfaction, performance and profiling data. They have been providing consultancy services to the social housing sector for over 25 years.

## There are two ways residents can take part:

- **Completing an online survey** - In September, Acuity will contact leaseholders and some of our tenants by email or text message inviting them to complete the survey online.
- **Completing a telephone survey (tenants only)** - In October Acuity will telephone tenants inviting them to complete the survey with one of their telephone interviewers.

## What number to look out for?

If you received a call Acuity the number displayed will be **01273 093939**, which is a Brighton Area code.





### When will they call our residents?

Acuity only make calls between the hours of 9:00am and 20:00pm Monday to Friday and between the hours of 10.00am and 18:00pm on Saturday. Interviewers allow the telephone to ring for a minimum of 25 seconds, or until a voice mail system kicks in, to ensure customers with mobility issues are given sufficient time to get to the phone.

### What telephone number is displayed?

If a resident receives a call from Acuity the number displayed is **01273 093939**, which is a Brighton Area code. If the resident sees a missed call from this number and calls back, they will hear a recorded message informing them that someone from Acuity tried to call them to complete a survey for their landlord.

### What can I do to help residents and boost response rates?

It is **really important** that front line staff encourage residents to take part at every opportunity and assist residents with queries about the survey and reassure them that the calls are genuine.

### Is the survey confidential and anonymous?

The survey is strictly confidential and if a resident requests, the results can be given back to the Corporation anonymously without their name attached.

### Is the survey in line with data protection and what about quality standards?

All the calls are recorded for training and quality purposes. Acuity is a company partner member of the Market Research Society and is registered with the Information Commissionaires Office, and in line with the Data Protection Act is not permitted to release any details to any other organisation. Under the Data Protection Act Acuity is not permitted to release any information that would allow an individual to be identified without their prior active consent to do so. Acuity also holds ISO20252:2019, which is the quality standard for market research companies.

### Who should I contact at the Corporation or Acuity if I have a query that is not addressed here?

If you have any queries about any of the survey, please contact Liane Coopey at the City of London Corporation ([liane.coopey@cityoflondon.gov.uk](mailto:liane.coopey@cityoflondon.gov.uk)) or Heather Metivier at Acuity (01273 287114 or [acuity@arap.co.uk](mailto:acuity@arap.co.uk)).

### Want to know more about Acuity?

Acuity Research & Practice Limited, [www.arap.co.uk](http://www.arap.co.uk) UK Tel: +44 (0) 01273 287114 Company Number: 3503391  
All research projects are carried out in conformity with ISO20252:2019 and the MRS Code of Conduct.



# Agenda Item 8

<b>Committee:</b> Housing Management and Almshouses Sub-Committee	<b>Dated:</b> 29 November 2023
<b>Subject:</b> Guest Rooms Review	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	4
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>£</b>
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>Y/N</b>
<b>Report of: Executive Director of Community and Children's Services</b>	<b>For Decision</b>
<b>Report author: Liam Gillespie, Head of Housing Management, DCCS</b>	

## Summary

The Housing Division has eight guest rooms for use by residents wishing to accommodate their visitors for short stays; six on Golden Lane Estate and two on Middlesex Street Estate. These facilities were part of the original design concepts for the two estates and were provided due to the high proportion of smaller flats on each site.

A nightly charge is made for the facilities, which is offset against the cost of providing the facilities. At the January 2023 meeting of this Sub-Committee, Members requested that officers review the current provision and consider the affordability of the current charges.

This report summarises the current position and outlines suggestions for a pricing structure, on which Members are invited to comment.

## Recommendation

Members are asked to:

- Note the report
- Approve the proposed pricing structure for the guest room facilities (includes reductions to current nightly rates)

## Main Report

### Background

1. Guest rooms are provided at Golden Lane Estate and Middlesex Street Estate for use by residents, to accommodate their guests for short stays.
2. The rooms are basic and offer beds, en-suite bathroom facilities and 'hotel-room' items such as tea and coffee making facilities. Bedding is currently provided for use by guests.
3. Officers have been asked to review the current provision due to questions around the cost of booking these facilities and the cost to the Housing Revenue Account of operating them. This report is intended to give an overview of the current provision and provide a revised pricing structure for comment.

### Golden Lane Estate

4. Golden Lane Estate's guest rooms are described below. The rooms form part of the original design and intention for the estate, which was built between 1956 and 1962.

<b>Number:</b>	6 guest flats
<b>Type:</b>	3 singles and 3 doubles
<b>Facilities:</b>	Shower/toilet facilities, TV, wardrobe, tea/coffee making facilities
<b>Current cost:</b>	<ul style="list-style-type: none"><li>• £80 per night for a double (Golden Lane residents)</li><li>• £60 per night for a single (Golden Lane residents)</li><li>• £90 per night for a double (Barbican residents)</li><li>• £70 per night for a single (Barbican residents)</li></ul>
<b>Occupancy:</b>	Usage has reduced since the pandemic, however, more enquiries being made and booking are expected to increase.
<b>Users:</b>	85% of bookings are by Barbican residents or leaseholders on the Golden Lane Estate. In 2019/20, only 5 tenants made a booking.

5. The estate is predominantly made up of smaller properties (studios and one/two-bedroom homes) and these facilities were provided for use by residents who wished to accommodate their visitors in the local area. It is not known what the historic pricing structure was, however, it is reasonable to assume that the guest rooms were meant to provide a more affordable alternative to local hotels, as well as being conveniently situated on the estate.

6. The current pricing structure has been in place for several years. Further details about income and expenditure can be found below.

### **Middlesex Street Estate**

7. Middlesex Street Estate was completed in 1972 and two guest rooms were provided for use by residents. These are located on Petticoat Square, on an upper floor on the Harrow Place side of the estate. The facilities are described below.

<b>Number:</b>	2 guest flats
<b>Type:</b>	1 single and 1 double
<b>Facilities:</b>	Shower/toilet facilities, TV, wardrobe, tea/coffee making facilities
<b>Current Cost:</b>	<ul style="list-style-type: none"> <li>• £55 per night (double)</li> <li>• £45 per night (single)</li> </ul>
<b>Occupancy:</b>	Pre-pandemic, 2 to 4 bookings per month, average 3-night stay. The facilities re-opened in September 2023 following full refurbishment.
<b>Users:</b>	Middlesex Street residents only

8. The guest rooms at Middlesex Street were taken out of use for some time as they needed significant refurbishment, this has now been completed and the rooms are back in use. The work included redecorating throughout, installing new flooring and completing repair works to the bathrooms.

### **Financial Information**

9. Financial information for the last five years can be found below. Members will note that the rooms have consistently cost more to provide than they produce in income.

	<b>Year</b>	<b>Expenditure</b>	<b>Income</b>	<b>Total</b>
<b>Golden Lane</b>				
	2021-22	11,471.91	657.58	-10,814.33
	2020-21	29,385.76	2,603.81	-26,781.95
	2019-20	39,639.29	24,394.57	-15,244.72
	2018-19	49,896.27	21,890.68	-28,005.59
	2017-18	9,936.89	28,144.12	18,207.23
<b>Middlesex Street</b>				
	2021-22	1,645.15	845.06	-800.09
	2020-21	4,486.68	17.62	-4,469.06
	2019-20	6,978.65	2,055.20	-4,923.45
	2018-19	6,375.02	6,806.28	431.26
	2017-18	10,683.36	22,189.11	11,505.75

## Considerations

10. The guest rooms currently run at a cost to the HRA. The fall in bookings since the pandemic, coupled with the costs of cleaning and maintenance, mean that they are unlikely to be profitable, however the income in previous years has been significant and has reduced the impact on the HRA.
11. It is unlikely that the rooms were ever intended to support their own running costs. Instead, they were provided as a convenient facility for use by residents, at a reasonable cost, as part of the facilities paid for by the income to the HRA. Amenities provided for resident use are not normally required to make a profit (another example is community rooms).
12. While it is sensible to try to cover the costs associated with laundry and refreshing consumables, it would not be possible for the income to meet other running costs such as utilities, staffing and repairs/maintenance, even if prices were raised significantly above current levels. Laundry costs make up a significant element of the running costs and it has been suggested that a policy could be adopted of residents providing their own bed linen or paying extra for us to provide it upon request. It is suggested that this approach is adopted, at least for a trial period.
13. Usage data shows that the Golden Lane guest rooms are predominantly hired by leaseholders living on the Barbican and Golden Lane Estates. Anecdotal evidence is that the rooms are considered too expensive by many residents, with hotels in the area being priced at a similar level for superior facilities.
14. Bearing in mind that generating a surplus is not necessary, officers have reviewed the pricing structures to make the facilities more affordable, which may encourage more bookings by residents. That, coupled with the refurbishment works on some rooms, may increase interest, and generate more income.
15. While a profit is unlikely, the rooms, if properly managed and maintained, will be regularly used and the demand placed on the HRA minimised as far as possible by the generation of a healthy income.
16. It is clear from usage data that there is still a demand for these facilities from residents and setting the fees at a more reasonable level will likely encourage wider use of the facilities by residents. The facilities are intended to provide a useful and affordable amenity to residents. It is therefore only fair that they are charged at a level that will allow residents to make use of them.
17. The guest rooms are also a useful facility from a housing management perspective, as they can occasionally be used to provide short-term emergency accommodation to residents who are displaced by emergencies, or for respite from major works projects.

## Current Policy

18. The current policy on Guest Rooms states that rates will be set with reference to the cost of providing the facilities. However, given the financial data already outlined, this position will have to be reviewed and the policy reconsidered, as this is not achievable for the reasons outlined above.

## Recommendations

19. On the basis that the guest rooms are intended as an amenity for the convenience of residents of Golden Lane and Middlesex Street Estates, and are not meant to be profitable, it is recommended that:

- the guest room hire rates are reduced to make them more accessible to a wider group of residents living on Middlesex Street and Golden Lane Estates
- Bed linen will only be supplied upon request, for a reasonable additional charge
- Higher rates can be maintained for non-residents (applicable to Golden Lane only)
- The Guest Rooms Policy is revised to reflect this change to the basis for the charges

20. Officers were delegated authority as long ago as 1997 to set pricing for the guest rooms. The terms of that delegation allowed changes of plus or minus 15% to be implemented by officers.

21. Members are asked to approve the rates as follows:

### *Resident rates*

- Golden Lane double: reduce from £80 to £40
- Golden Lane single: reduce from £60 to £30
- Middlesex Street double: reduce from £55 to £40
- Middlesex Street single: reduce from £45 to £30

### *Barbican residents (applies to Golden Lane only)*

- No change to current rates

22. The revised rates represent a reduction of between 25-50% and therefore require Member approval.

23. A further consideration is that a system of concessionary rates could be introduced, for instance for residents in receipt of means-tested benefits. The above rates may still be unaffordable for those on a very low income and

reduced rates could help more residents make use of the guest rooms. Members' comments on this point are welcomed.

## **Implications**

24. Reducing nightly rates for the guest rooms will reduce income to the HRA, if bookings remain at the same level. However, the reduction in nightly rates may encourage a wider range of residents to use the facilities, which it is hoped will mitigate the loss of income.
25. Officers will monitor the income and expenditure and report back to Committee on progress once the new rates have been in place for a reasonable amount of time, to gauge the impact on booking levels and income.

## **Conclusion**

26. Guest room provision on Golden Lane and Middlesex Street Estates has been reviewed. The facilities currently run at a cost to the Housing Revenue Account, however it is unlikely that they were ever intended to break even or make a profit.
27. Instead, they are intended as convenient and affordable facilities for residents, especially those living in smaller homes who wish to have friends and family stay with them.
28. It is obvious that there is still a healthy demand for these facilities, however the nightly rates are potentially too high and have the effect of restricting access to the facilities.
29. Members are asked to approve the proposed reduced rates, which are intended to make the facilities accessible to a wider range of residents living on Golden Lane and Middlesex Street Estates, while still bringing in some income to offset the cost to the HRA of providing the facilities. Income and expenditure will continue to be reviewed regularly.

## **Appendices**

- None

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# Agenda Item 9

<b>Committee:</b> Housing Management and Almshouses Sub-Committee	<b>Dated:</b> 29 November 2023
<b>Subject:</b> Unreasonable Behaviour Policy	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1, 2
<b>Does this proposal require extra revenue and/or capital spending?</b>	<b>N</b>
<b>If so, how much?</b>	<b>£</b>
<b>What is the source of Funding?</b>	
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	<b>Y/N</b>
<b>Report of:</b> Executive Director of Community and Children's Services	<b>For Decision</b>
<b>Report author:</b> Liam Gillespie, Head of Housing Management, DCCS – Housing Division	

## Summary

We are committed to responding to all complaints, enquiries and service requests in a professional and timely manner and to providing residents with access to staff who can provide them with help. Unfortunately, we sometimes experience unacceptable behaviour from residents and service users, including abusive, threatening or insulting words or behaviour, or unreasonable complainant behaviour which places an excessive demand on our resources. These instances are rare but can have a negative impact on staff members and our ability to provide services to residents.

The Housing Ombudsman Service encourages landlords to have a policy in place to respond to unreasonable or unacceptable behaviour from residents and we have drafted a new Unreasonable Behaviour Policy to set out our approach to these issues.

The Unreasonable Behaviour Policy is intended to give reassurance to staff that they will be supported when unreasonable behaviour occurs. It also sets out our commitment to ensuring that residents are heard, understood and respected, and emphasises that we will deal with instances of unreasonable or unacceptable behaviour in a fair, consistent and proportionate manner, with due regard to equalities implications.

## Recommendation

Members are asked to:

- Approve the Unreasonable Behaviour Policy for use by the Housing Division

## **Main Report**

### **Background**

1. The Housing Division handles thousands of enquiries from residents and other service users every year, from simple service requests to more complex enquiries or complaints. Most of these interactions are concluded without issue, however sometimes staff experience unacceptable or unreasonable behaviour from residents and others.
2. In this context, unreasonable behaviour refers to:
  - unacceptable conduct affecting, or directed at, an individual person or identifiable group, such as aggression, threats, abuse or harassment
  - unreasonable behaviour in the context of a complaint or other service request, which may involve the making of unreasonable demands, persistently revisiting resolved complaints or making unreasonable levels of contact with the Housing Division. This is commonly referred to as 'vexatious' behaviour, however this term is not used in our draft policy
3. The Housing Ombudsman and the Local Government and Social Care Ombudsman encourage members of their schemes to have a clear policy on unreasonable behaviour, to ensure that incidents are dealt with fairly, proportionately and consistently. The Housing Ombudsman's Complaints Handling Code also requires social landlords to have a clear policy on dealing with unreasonable complainant behaviour.
4. A draft Unreasonable Behaviour Policy has been produced for Members' consideration, which is meant to provide a clear statement on our handling of unacceptable behaviour towards staff and explain how we will deal with the small number of cases where people make excessive and unreasonable demands on our services while making complaints or service requests.
5. The policy aims to give staff a framework that helps them feel confident and supported when deciding upon the right course of action if an issue arises. It also aims to ensure a fair, proportionate and consistent response to every situation and make sure that residents/service users are treated fairly and with respect regardless of their behaviour.
6. We understand that people may behave in a particular way due to being distressed or upset, or because they have support needs or vulnerabilities that make communication more difficult for them. We will ensure that this is considered when responding to instances of unreasonable behaviour and will put support in place to assist people where possible. The draft policy also emphasises that we will have due regard to equalities considerations in managing these situations, including the Public Sector Equality Duty and any relevant protected characteristics, in accordance with the Equality Act 2010.



## **Current Position**

7. It should be stressed that these incidents form only a very small proportion of the interactions our staff have with residents and service users, however the impact of incidents of abuse or aggression on staff wellbeing and morale can be very serious, despite their rarity.

### *Acts directed at individuals or groups*

8. This includes unacceptable language in e-mails or telephone calls, abuse, threats and intimidation. Some examples of incidents we have recorded include:
  - The use of racially offensive language towards several staff members at an estate office
  - Shouting at and threatening violence towards a staff member in an estate office
  - Threatening violence towards a contractor who was working on an estate
  - Repeatedly sending emails to a member of staff containing false accusations of misconduct and using personal abuse
  - Using an online forum to abuse, insult and patronise staff, including making prejudiced remarks about staff and their race or nationality
9. These incidents were dealt with through various means, including an injunction, warning letters from officers and formal legal letters from the Comptroller and City Solicitor's Department.
10. Our tenancies and leases contain terms dealing with antisocial behaviour and nuisance and we will also invoke our Antisocial Behaviour Policy where justified.

### *Unreasonable complainant behaviour*

11. We occasionally experience situations in which individuals making complaints or service requests place demands on our resources which are out of all proportion to the underlying issue. While this is relatively rare, it is important that situations such as this are effectively managed to ensure that we can address any legitimate enquiries and allocate resources fairly to assist others who need our help. Some examples we have experienced include:
  - Repeatedly raising the same unfounded complaint over several years and refusing to accept the outcome despite multiple independent investigations which concluded the matter
  - Writing extensive and repetitive correspondence thousands of words long on trivial matters of complaint for which adequate remedy had already been given, copying in other agencies, repeatedly changing or adding to the complaints, refusing to accept the matters were concluded
  - Making repeated and lengthy written complaints but failing to provide requested evidence, or cooperate with the investigation; repeatedly submitting further extensive and irrelevant correspondence during the investigation and copying in multiple external agencies in a 'scattergun' approach

12. This type of behaviour places unreasonable demands on staff time and can, in some circumstances, cause distress or nuisance to those handling the matter. Sometimes, contact becomes so excessive that it seriously affects the ability of staff to help other people with legitimate complaints. Officers want to assist people with complaints and enquiries and will therefore review any communications received, however this task can be made difficult or impossible when it involves receiving excessive correspondence, or multiple communications in a short time.
13. Some of the incidents above resulted in restrictions being placed on the complainant's contact with the Housing Division, with Chief Officer approval, due to the excessive demands placed on staff time. These restrictions were time-limited and regularly reviewed to ensure that they remained necessary and proportionate.

### **Our response to unreasonable behaviour**

14. When issues occur, we will try to resolve them informally wherever possible. The overriding principle of the policy is that any action we take must be reasonable and proportionate in the circumstances of the case, including taking due account of any individual support needs or protected characteristics. Invoking this policy will not stop us trying to resolve the underlying complaint or service request unless the process has been exhausted.
15. We have set out a range of actions that we might take in different circumstances. This policy is intended to be as transparent as possible and to foster consistency and fairness in our approach to unreasonable behaviour.
16. Where formal action is taken, we will limit this to what is necessary to protect the welfare of staff and any other people affected. Restrictions imposed due to unreasonable contact will also be proportionate and designed to enable us to continue to assist the resident or service user with any legitimate enquiries.
17. Decisions to restrict contact must be authorised by a senior officer after full consideration of the facts of the case and reviewed at specified intervals. Any decision to make restrictions is subject to a right of appeal. This fulfils the requirements of the Housing Ombudsman in their guidance on such policies.
18. When restricting or modifying contact with an individual, we will take account of any communication needs they may have and promote the use of mediation, to ensure mutual understanding and clarify the nature of their enquiry or complaint. We will also encourage the use of independent advocacy services to assist individuals with support needs, to ensure they are still able to request services from us.

### **Recommendation**

19. Members are asked to approve the Unreasonable Behaviour Policy for use by the Housing Division.

## **Corporate & Strategic Implications**

### **Strategic implications**

This policy will support the delivery of our strategic aims in both the Corporate Plan and the Housing Strategy.

*Corporate Plan 2018-23:*

- People are safe and feel safe

*Housing Strategy 2019-23:*

- Well-managed estates that people are happy and proud to live in (the policy will support the effective management of our estates by supporting staff in fulfilling their roles)

The policy also meets good practice recommendations by the Housing Ombudsman and Local Government and Social Care Ombudsman relating to unreasonable complainant behaviour, by setting out a clear statement of how we will respond when these issues arise.

### **Equalities implications**

The policy will support us in meeting our Public Sector Equality Duty (Equality Act 2010, s.149) by ensuring that we have due regard to the need to eliminate discrimination and foster good relations. Proportionality and equalities principles are an integral part of the policy. We will ensure that officers take account of protected characteristics and any applicable support measures that may benefit an individual when invoking the policy. Decisions taken under the policy will be fully documented and, in some instances, subject to approval and regular review.

## **Conclusion**

20. A draft Unreasonable Behaviour Policy has been written, which covers circumstances in which individuals display unacceptable behaviour towards staff in the Housing Division, or place unreasonable demands on our resources while making complaints or service requests.

21. The use of such a policy is encouraged by the Housing Ombudsman and is designed to ensure fairness, consistency and transparency in our responses to unreasonable behaviour. The policy specifically addresses the need for fairness and proportionality in making decisions which restrict someone's contact with us, or where they may be subject to formal action.

22. The policy is intended to provide reassurance and confidence to staff in responding to unreasonable behaviour and make sure that due regard is had to the needs of individuals who may be exhibiting unacceptable behaviour or placing unreasonable demands on our resources.

## **Appendices**

- Appendix 1 – Draft Unreasonable Behaviour Policy
- Appendix 2 – Consultation responses

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**City of London Corporation**  
**Department of Community & Children's Services**  
**Housing Service**

**Unreasonable Behaviour Policy**

<b>Approved by:</b>	<b><i>Housing Management &amp; Almshouses Sub-Committee</i></b>
<b>Version</b>	<b><i>Version 1</i></b>
<b>Original Approval Date:</b>	
<b>Review Date:</b>	<b><i>**3 years from approval**</i></b>
<b>Re-Approval Date</b>	
<b>Next Review Date</b>	<b><i>**3 years from re-approval**</i></b>

## **1. Introduction**

This Policy sets out our approach to dealing with people whose actions or behaviour we consider unacceptable or unreasonable.

We are committed to responding to all complaints, enquiries and service requests in a professional and timely manner. Occasionally, a person may display unacceptable behaviour towards our staff, or may place unreasonable demands on our resources by being unreasonably persistent or repetitive in their contact with us. In those cases, we may invoke this policy, or take other action, to protect our staff from unacceptable behaviour and effectively manage our resources.

This policy explains what we mean by unacceptable and unreasonable behaviour and what we will do when it happens.

## **2. Policy Aims**

This policy aims to:

- define the situations in which someone's behaviour may be considered unacceptable or unreasonable
- identify sanctions or other measures that may be employed when such behaviour occurs
- to ensure a consistent approach which is appropriate and proportionate to every situation
- enable our staff to feel confident and supported when deciding on the appropriate course of action
- to ensure that all customers, regardless of their behaviour, are treated with respect and dignity and have the right to be heard

## **3. Statement on Staff Wellbeing**

It is essential that our staff are safe and feel safe. Our staff have the right to carry out their duties without fear of being abused or harassed. We have a duty as an employer to take reasonable steps to protect the health and wellbeing of our staff.

We will invoke this policy where necessary to ensure that staff safety and wellbeing is protected, while meeting our obligations towards residents.

## **4. Scope of this policy**

This policy applies to anyone who is in contact with the Housing Division about any matter, including those contacting us on someone else's behalf. It covers all methods of contact including telephone, face-to-face, letters, e-mails, social media and other digital channels.

Behaviour directed at our staff, agents or contractors is included in the scope of this policy.

## **5. Why we have an unacceptable behaviour policy**

We believe that our residents and service users have a right to be heard, understood and respected. We encourage people to contact us if they are dissatisfied with a service we provide, a decision we have made, or if they want information from us. We understand that this will sometimes involve us having contact with people who are distressed, angry or frustrated and that people may act out of character when they are upset.

Occasionally, someone's behaviour makes it very difficult for us to deal with their complaint or service request. In some cases, the behaviour may be unacceptable because it includes abuse of our staff, or our processes. We will use this policy to manage such behaviour, ensure staff wellbeing and manage our resources effectively.

## **6. Defining unacceptable or unreasonable behaviour**

We do not view behaviour as unacceptable just because an individual is assertive or determined in their approach to us. Raising legitimate queries, or criticisms of our services, will not in itself lead to a complaint or request being regarded as unreasonable.

While we accept that those who contact us may feel angry or frustrated, it is not acceptable to abuse, harass or threaten our staff. We will judge each situation individually and we will have due regard to the known personal circumstances of the individual concerned when invoking this policy.

Additionally, we may decide that comments aimed at third parties are unacceptable because of the effect that listening to or reading them may have on our staff.

### ***i. Aggressive and threatening behaviour***

Any violence, threats of violence, or abuse towards staff will not be tolerated. Aggressive or abusive behaviour includes:

- physical assault
- threats of violence
- personal abuse
- shouting, raised voices
- aggressive or threatening gestures

### ***ii. Unacceptable language***

The following language is regarded as unacceptable:

- threatening, intimidatory, abusive or offensive
- derogatory, insulting or belittling
- discriminatory or hateful in any way, including racist, sexist or homophobic comments

- inappropriate sexual comments

### **iii. *Unfounded allegations***

This includes making unfounded or unevidenced allegations that staff or contractors have committed criminal, corrupt, discriminatory, negligent or immoral acts.

### **iv. *Harassment***

Examples of behaviours we consider to be harassment against our staff include:

- contacting staff using their personal details or social media presence
- publishing personal, sensitive or private information about staff online or in other public domains
- making unfounded or unevidenced accusations against staff (please see above section on aggressive or abusive behaviour)
- filming, photographing or recording staff without their consent while they carry out their duties.

## **7. Unreasonable or excessive contact**

We aim to provide a prompt and effective response to complaints and enquiries. Staff will do their best to respond sympathetically to complaints and to resolve enquiries and service requests with professionalism and fairness.

We are sometimes presented with challenging situations and experience unreasonable or excessive contact from residents, service users or third parties.

In some cases, the conduct may cause anxiety, distress or nuisance to staff due to the manner in which the complaint or enquiry is being conducted by an individual. It may also have an unacceptable impact on our resources, particularly staff time.

- i. Unreasonable demands** – this can include demanding responses within an unreasonable timescale; insisting on dealing (or not dealing) with a specific member of staff; repeatedly changing the substance of a complaint; raising unrelated concerns; requesting old complaints be revisited; refusing to accept a decision and requesting large volumes of information without good reason.
- ii. Unreasonable levels of contact** – this can include excessive correspondence (or volume of correspondence) or telephone calls; copying in several members of staff or other agencies; repeatedly raising the same complaint
- iii. Unreasonable refusal to co-operate** – this can include refusing to provide further details, evidence, clarity or a summary of the concerns raised, or not co-operating with normal procedures.



## **8. How we will manage unreasonable behaviour**

### **i. Informal resolution**

We will attempt to resolve issues informally and provide a warning before taking any formal action, however where the behaviour is serious, for example if it involves threatening or assaulting staff, we may proceed directly to formal action.

The purpose of informal resolution is to allow the individual time to consider and adjust their behaviour.

During interactions with residents, service users and third parties, staff are entitled to address unacceptable behaviour in an informal manner if it is appropriate to do so. This may include giving warnings about future behaviour or requesting that the person ceases certain behaviour. This may be communicated verbally or in writing.

We will also consider mediation or advocacy through third parties to try to improve the situation, where appropriate.

### **ii. Formal resolution**

When we experience unacceptable behaviour or unreasonable demands, we may take more formal action.

#### *Unacceptable Behaviour*

Where the conduct includes anything in **section 6 (i – iv)** above, we will consider:

- Warning the individual in writing about their behaviour and requesting they modify their behaviour in future contact with us
- Restricting contact to a specific method (e.g., e-mail)
- Requiring any personal contact to take place in the presence of an appropriate witness and/or at a suitable location
- Taking legal action to enforce a tenancy or lease, or using other legal powers such as injunctions
- Banning an individual from attending our premises
- Refusing to make home visits or making these only by staff attending in pairs, or with a police presence
- In serious cases, notifying the police

If the behaviour involves the misuse of social media, we may also consider:

- Hiding or deleting posts
- Blocking access or deleting user accounts
- Reporting posts to the social media platform

This is not an exhaustive list and we may use a combination of the above as appropriate.

#### *Unreasonable or excessive contact*

Where the conduct involves anything in **section 7 (i – iii)** above, we will consider:

- Appointing a single point of contact for the individual, which may be a named individual or an e-mail/correspondence address
- Extending our normal customer service standard for responses to enquiries
- Only accepting contact through specified means, or through a representative
- Limiting contacts to a specified number per week or month
- Offering a restricted time slot for necessary telephone calls
- Deciding not to investigate a complaint, or substantively respond to a request, on the basis that it has been pursued in a way that is unacceptable, has been resolved, or the relevant process has been exhausted
- Declining to further consider an issue unless additional information or evidence is provided within a specified time
- Stopping all communication with the individual for a specified period (there will normally be exceptions such as genuine emergencies or reporting repairs)

This is not an exhaustive list and we may implement other measures appropriate to the individual case. A combination of the above measures may be put in place.

### **9. Explaining our decision**

Where it is decided that formal action must be taken, we will inform the individual of the decision in writing. In serious cases, for instance if we seek an injunction, this action may be taken without prior notice but will be followed up in writing. We will explain:

- why the decision has been taken
- what it means for their contact with us
- how long any limits will last
- the review process
- available appeal rights

### **10. Proportionality**

When it is decided that restrictions are appropriate, we will consider which of the above options best fits the circumstances. The restrictions applied will be proportionate to the circumstances of the case, considering the nature, extent and impact of the conduct. We will also have due regard to any support needs or equalities considerations.

## **11. Duration of restrictions and review arrangements**

Any restrictions on contact will be limited to a reasonable period depending on the circumstances and will not exceed 12 months in the first instance. The individual will be informed of the duration of restrictions and the review date in the explanatory letter.

The matter will be reconsidered as the review period approaches. The review may result in restrictions being removed, modified in some way, or extended in their current form. A time limit will be set as before and will not exceed 12 months.

We will notify the individual of the outcome of the review in writing. The review will be carried out by an officer of appropriate seniority.

A review may be carried out at our discretion before the specified review date.

## **12. Levels of authority**

Officers who directly experience aggressive, abusive, or unacceptable behaviour from an individual have the authority to deal immediately with that behaviour in a manner they consider appropriate to the situation. Otherwise, it may be addressed by another officer following the incident (e.g., a more senior staff member).

Apart from the above, decisions to restrict contact due to unreasonable or excessive communication, and any reviews of restrictions, will be taken by an officer of Assistant Director level or above.

## **13. Appeals against restrictions**

An individual who has restrictions placed on their contact with us is entitled to appeal the decision. The appeal must be made in writing within 20 working days of the decision being notified to them. Appeals will be considered by an officer at Assistant Director or Director level and will consist of a review of relevant documents only. The appeal will be concluded within 20 working days and the outcome provided in writing.

## **14. Safeguarding and support**

Where there is cause for concern about a person's welfare, we will work with relevant third parties and support services to ensure they are given appropriate assistance. We may suggest independent mediation to attempt to better understand someone's needs or the nature of their complaint. We may also suggest the use of an advocate or support worker to assist someone in communicating with us.

## **15. Equalities**

In applying this policy, we will have due regard to our Public Sector Equality Duty and the provisions of the Equality Act 2010. We will consider an individual's support needs and any relevant protected characteristics as part of any decision made under this policy.

We understand that some of our residents or service users may have disabilities or communication needs which may make it harder for them to express themselves or communicate clearly, especially when they are anxious or upset. We also recognise that some disabilities can make it difficult for individuals to assess the impact that their behaviour might have on other people.

Even if a customer has a disability, we may still use the policy if there are actions or behaviours which are having a negative effect on our staff or our work. Any action will be reasonable, proportionate and have due regard to the individual's needs.

## **16. Interaction with other policies**

In some situations, other policies may also apply to the behaviour in question. If the behaviour is serious enough, it may constitute antisocial behaviour, a hate incident or a criminal offence.

In those circumstances, we may invoke our Antisocial Behaviour Policy, and/or inform the police, as well as relying on the provisions of this policy. This may include taking tenancy/lease enforcement action or seeking an injunction.

The Antisocial Behaviour, Crime and Policing Act 2014 gives us powers to seek injunctions for housing-related antisocial behaviour, including antisocial conduct towards our staff.

## **17. Record keeping**

Records will be retained of the details of any action taken under this policy. The Housing Division will keep a record of:

- The nature of any restrictions imposed or sanctions taken
- When the restrictions came into effect and when they will be reviewed
- Correspondence to the individual informing them of the restrictions or sanctions, and relating to reviews carried out
- Which other departments were informed

Where a person has been identified as being violent or potentially violent, we will activate a warning marker on the relevant records management system. This will contain limited information and will comply with data protection regulations.

## **18. Data Protection and Information Exchange**

We will comply with our obligations under relevant data protection legislation and regulations. We will process and store personal information securely. There are some circumstances in which we are required by law to disclose information given to us. Where possible, we will explain this duty to the person providing us with the information before disclosing it.

## **19. Complaints**

Complaints relating to the use of this policy will be investigated under the housing complaints process if they relate to the correctness of the process followed by officers. We are unable to consider complaints which are essentially a disagreement about the content or existence of a particular policy.

Requests to appeal or review a decision to place restrictions on contact will not be treated as complaints.

## **20. Training**

Our staff will be made aware of the content of this policy and the procedure to be followed in reporting and dealing with unacceptable or unreasonable behaviour. We will also provide training to staff on lone working, managing their personal safety and handling challenging situations at work.

## **21. Exceptions**

We may make an exception to the approach outlined in this policy if the circumstances require it and it is reasonable to do so.

## **22. Monitoring**

We will monitor the use of this policy and keep records of formal action taken under it.

## **23. Associated Policies**

- Antisocial Behaviour Policy
- Complaints Policy
- Corporate Health, Safety and Wellbeing Policy
- Corporate Lone Working and Preventing Violence Policy
- Hate Incidents Policy
- Safeguarding Policy

## **24. Relevant Guidance**

- Housing Ombudsman Service – Complaints Handling Code
- Local Government and Social Care Ombudsman – Guidance on Managing Unreasonable Complainant Behaviour

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**Housing User Board (HUB)**  
**Comments on Draft Policy**

<b>Comment</b>	<b>Response</b>
<p>I think this is a very difficult area. The policy draft is clear and I can fully understand why it has been drafted. My only concern is that it could be used inappropriately and cause harm in residents who are mentally fragile.</p>	<p>Careful consideration will be given to any individual circumstances before the policy is applied in a particular case. Any action taken under the policy will not prevent us from providing support to someone where they need it.</p> <p>Any measures put in place will be proportionate in the circumstances.</p>
<p>I've read through your document and find it covers most situations that are likely to arise. As you point out, tempers can flare when a resident feels that they are being ignored.</p>	<p>Our aim is to provide services that residents are happy with and we will investigate any complaints about service failure. Invoking the policy will not prevent us trying to assist someone with a complaint or enquiry.</p>

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<b>Committee(s):</b> Housing Management and Almshouses Sub Committee	<b>Dated:</b> 29 November 2023
<b>Subject:</b> Independent 'Access' Review of our Social Housing Estates	<b>Public</b>
<b>Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?</b>	1, 2, 12
<b>Does this proposal require extra revenue and/or capital spending?</b>	N
<b>If so, how much?</b>	N/A
<b>What is the source of Funding?</b>	N/A
<b>Has this Funding Source been agreed with the Chamberlain's Department?</b>	N/A
<b>Report of:</b> Director of Community and Children's Services	<b>For Information</b>
<b>Report author:</b> Paul Murtagh Assistant Director Barbican & Property Services	

## Summary

The purpose of this report is to update Members on the outcome of the independent review of access into our social housing estates and to seek guidance from Members as to the priorities that should be given to the recommendations emanating from the review.

## Recommendation

Members are asked to note the recommendations emanating from the independent review of access into our social housing estates and to give guidance to officers on the priorities for improvements and how these priorities should be taken forward.

## Main Report

### Background

1. Evans Jones was appointed to carry out a 'pilot' access audit of the public areas of the City of London Corporation's social housing estate at Middlesex Street. The purpose of the review was to assess the accessibility of the common parts of the estate and make recommendations for improvements as required. For information and illustrative purposes, Evans Jones' access audit is attached at Appendix 1 to this report.
2. It was subsequently agreed that a similar access audit should be undertaken on the public areas of the remaining 11 Corporation social housing estates. Following

a compliant procurement process, Direct Access Consultancy Limited was appointed to carry out this work.

3. This report sets out the findings of the access audits across all 12 of the Corporation's social housing estates and, the subsequent recommendations for improvements.

## **Considerations**

4. The 'pilot' access audit carried out at the Middlesex Street Estate and, the access audits for the remaining 11 social housing estates, were required to assess estate approaches, entrances, and internal communal areas, and identify barriers to access for disabled users.
5. The criteria that was used to assess the common parts included:
  - Equality Act 2010.
  - BS8300-1-2018 - Design of an accessible inclusive built environment.
  - Part 1, External Environment Code of Practice.
  - The Building Act 1984, Approved Document M 2015 Edition Volume 1 - Access to and use of buildings (dwellings).
  - The Building Act 1984, Approved Document M 2015 Edition Volume 2 - Access to and use of buildings (buildings other than dwellings).
  - BS9999:2017 Code of Practice for fire safety in the design, management and use of buildings.
  - Revised Lifetime Homes Standard.
  - Wheelchair Housing Design Guide.
6. Attached at Appendix 2 to this report is a general summary of the findings of the 12 access audits and the resulting recommendations for improvements made by Evans Jones and Direct Access Consultancy Limited, along with officers' views on how these improvements may be achieved.
7. Members will also note that several of the recommendations included in the access audits are addressed, or can easily be addressed through the estate inspection and repairs and maintenance processes we employ across our social housing estates including:
  - accessibility of pull cords.
  - removing obstructions from communal areas (corridors, lobbies etc).
  - adjusting doors, where possible, to ensure they are easier to open and close.
  - repairing identified areas of uneven paving.
  - robust lift maintenance programme.
  - signing in process for visitors to our estates who may require assistance in the event of an emergency.
8. At its meeting on 17 April 2023, the Housing Management and Almshouses Sub Committee (HMASC) received a report on the outcome of the independent review

into the security of the Corporation's social housing estates. Some of the recommendations from the security review do align with recommendations from this access audit and can be dealt with simultaneously. This is particularly the case in relation to the external doors in some of our blocks of flats.

9. Now that we have completed both the security review and the access audit across our social housing estates, subject to the expressed views of Members, the two reports can be considered in parallel. It is proposed that the next step is for officers to put together a fully costed and prioritised Action Plan for the implementation of the accepted recommendations from the two reports. It is intended that this will be brought back to a meeting of the HMASC later this year.
  
10. Members will need to be mindful that there is currently no spare capacity within the Housing Major Works Programme for new projects. There is no current funding to carry out the improvements identified in the security review and the access audit. It is likely however, that some of the works will be addressed as part of the current Housing Major Works Programme and other minor works may be carried out as part of the Corporation's Repairs and Maintenance Programme. In terms of the latter, this is an option for carrying out adjustments to the entrance doors and internal communal doors to our blocks of flats to make them more accessible.

## **Appendices**

Appendix 1: Evans Jones Access Audit – Middlesex Street Estate  
Appendix 2 – Access Audit – Summary Recommendations

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## Access Audit

Common parts of Petticoat Square  
Artizan Street  
London

Prepared on Behalf of  
City of London

Ref: 16184

Date: 26th January 2022

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Cheltenham | London | Reading

 0800 001 4090

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Project  
Management



Planning  
Consultants



Building  
Surveying



Disabled Access  
Consultancy

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## **A Executive Summary**

- A1 As a residential landlord you have very limited obligations to make any form of physical adjustment under the Equality Act thus our recommendations should be seen as advisory only.
- A2 This being said as a public body you do have an obligation to promote disability equality and thus, at the very least we suggest that our recommendations are incorporated into your longer term maintenance and refurbishment plans in order that accessibility is gradually improved over time.
- A3 The site is generally relatively accessible although we would highlight the following items which are likely to pose a significant barrier to access by a disabled user; heavy entrance doors; means of escape provisions to lower levels.

## **B Introduction & Methodology**

### **B1 Brief & Aims of Report**

- B1.1 The following report is an assessment of the common parts of Petticoat Square against the criteria set out in Section B3 below.
- B1.2 The purpose of this report is to assess these areas and identify barriers to access by disabled users.
- B1.3 In order to achieve this the report will identify where the property does not meet current best practice standards and will recommend ways to overcome these issues which may incorporate adjustive works, changes to management policies and procedures or a combination of the two.

### **B2 Legislation**

- B2.1 As a Public Body the Disability Equality duty will apply to all of your functions including this property.
- B2.2 Sections 3 and 5 of the Act will have limited application to this property. Section 4 is the most relevant which we cover under Section D below.

### Part 3 - Service Provision

- B2.3 This section relates to service provision to members of the public.

- B2.4 Under this section it is illegal to discriminate against a disabled person and the service provider is obliged to make reasonable adjustments to make their service accessible to members of the public. These may include physical adjustments or adjustments to policies, practices or procedures to overcome barriers to access.
- B2.5 This is a proactive duty so the service provider is obliged to anticipate the service of a disabled person and make adjustments in advance.
- B2.6 As you have confirmed that there is no public access to this site this will not generally apply other than to the perimeter. See Section D for more clarification.

#### Part 5 - Employment

- B2.7 As an employer it is illegal to discriminate against a disabled people in terms of employment, which may involve making reasonable adjustments to policies, practices or procedures or physical alterations to premises.
- B2.8 This is a reactive duty. There is no obligation to take anticipatory steps to make a site accessible but rather to make reasonable adjustments for the individual disabled person.
- B2.9 This being said, it is prudent to incorporate accessibility into any refurbishment of staff areas.
- B2.10 As landlord this can only relate to your own employees.
- B2.11 Where a tenant employs a disabled person it will be the tenant's responsibility to make reasonable adjustments for that person.

#### Section 149 - Equality Duty

- B2.12 As a public body you are also obliged to eliminate unlawful discrimination, promote equality and to foster good relations between disabled and non-disabled people.
- B2.13 This applies to everything you do including the way you deliver your services using your buildings and how you manage your buildings generally.
- B2.14 The findings of our audit and in particular the prioritisation of recommendations should be reviewed against your own Equality Policy and how it relates to buildings.
- B2.15 As an example it may be that, depending on your policy, you choose to bring forward recommendations which, through your duties under other sections of the Act we have categorised as longer term priorities.

### **B3 Criteria**

- B3.1 The following documents have been used as the criteria against which the premises will be audited.



- Equality Act 2010 (Replaces Disability Discrimination Acts 1995 & 2005)
- Equality Act 2010- Code of Practice on Services, Public Functions and Associations (2011 edition).
- BS8300-1-2018 -Design of an accessible inclusive built environment - Part 1 External Environment Code of Practice
- BS8300-2-2018 - Design of an accessible inclusive built environment - Part 2 Buildings Code of Practice
- The Building Act 1984, Approved Document M 2015 Edition Volume 2 - Access to and use of buildings, volume 2: buildings other than dwellings
- BS9999:2017 Code of Practice for fire safety in the design, management and use of buildings.
- The Building Act 1984, Approved Document M 2015 Edition Volume 1 - Access to and use of buildings, volume 1: dwellings.
- Revised Lifetime Homes Standard - Published 5 July 2010 by Habinteg
- Wheelchair Housing Design Guide - Third Edition Published by Habinteg

B3.2 All recommendations made in this report shall, as far as possible meet the guidance set down in the criteria documents. However, due consideration will be given as to whether the alterations are "reasonable" as set out in the Act and the Codes of Practice arising from it.

#### **B4 Scope**

B4.1 This report is limited to those areas within the Landlord's demise. It does not examine areas within a Tenant's demise but rather those common areas giving access to a Tenant's facilities, i.e. car parks, reception, lifts, stairs etc.

B4.2 Those areas within a Tenant's demise will, quite rightly, be the Tenants own responsibility in terms of accessibility and so are not covered by this audit.

B4.3 Although we have included the Code of Practice for Means of Escape for Disabled People within our criteria this report should not be considered as a detailed assessment of the overall means of escape provision, which should be included in the Emergency Evacuation Plan.

B4.4 Plant rooms, workshops, stores and machinery rooms are excluded from our inspection as is the Library space and all residences.

#### **B5 How to Use this Audit**

B5.1 Section D sets out our approach to the audit and outlines the relevant legislation. This forms the basis of our report and puts our findings into context, it is important that this is read and absorbed prior to considering our findings within Section E.

B5.2 The Audit findings list our recommendations in short form with each allocated a priority rating and cost banding/budget cost. These recommendations should form

the basis of your programme of adjustive works, Access Action Plan or Accessibility Plan.

B5.3 These recommendations are supported by more detailed discussion under the heading 'Issue' to:

1. explain why a recommendation has been made
2. justify why no action has been taken where a problem exists
3. give the reader an insight into the problems disabled people face in accessing the site
4. provide more detail and further guidance as to how the recommendations should be implemented

B5.4 In order to gain a full understanding of our recommendations Section E should be read in detail.

## **B6 Taking Action on the Results**

B6.1 This audit should be seen as the first step towards making the property more accessible to its disabled users. If no action is taken on the results you will be discriminating against disabled users and consequently will be at increased risk of claims for compensation.

B6.2 The recommendations of this audit have been prioritised and allocated costs in order to allow you to form a long-term strategy for their implementation. This strategy should then be integrated into your current maintenance, refurbishment and capital works programmes.

B6.3 By doing this you will avoid compromising the recommendations of the report with maintenance, refurbishment or capital projects and therefore are likely to save money by avoiding costly mistakes which may require rectification at a later date.

## **B7 Statutory Consents**

B7.1 Unless informed otherwise we have assumed that the site has no particular restrictions on development other than the usual Planning and Building Regulation requirements.

B7.2 Where you choose to implement the work outlined in our report we recommend that you take further advice as to the application of Planning or Building Regulations prior to proceeding.

B7.3 As Surveyors and Planning Consultants Evans Jones can offer this advice as a separate service. Alternatively we recommend that you contact a Chartered Surveyor (RICS), Planning Consultant (MRTPI) or Architect (RIBA) for this advice.

B7.4 Evans Jones Ltd accept no liability where you proceed with works without seeking such advice.

**B8 Alternative Format**

B8.1 Copies of this report are available in alternative formats upon request.

B8.2 Please contact us to discuss your individual requirements.

## C The Site

Address: Common parts of Petticoat Square  
Artizan Street  
London



Date: 26th January 2022

Contact: Matthew Ring

Location: The site is set in a town centre and thus is generally surrounded by a variety of properties.

Given the location and usage of the site we find it likely that users will arrive here by all modes of transport.

Conditions: The weather at the time of our inspection was fine and bright with no rain. It was cold.

Our inspection was carried out during daylight hours.

The site was in use at the time of our inspection but we had unrestricted access to all relevant areas.

## **D Context of Site and Approach to Audit**

### **D1 Ownership**

We assume the City of London retain the freehold and are responsible for the maintenance of the common parts and services to include the podium courtyard and car parking areas.

You have confirmed that this is truly a private estate with no access for members of the public.

### **D2 How the Equality Act applies to the site**

As this site is not open to members of the public we do not consider that the City of London are providing services to members of the public in their maintenance of the common parts of the site and thus we do not generally consider that Section 3 of the Equality Act will apply.

Based on what you have told us we consider that the more relevant section of the Act is Part 4, which relates to the disposal and management of premises.

As far as we can tell the relationship between the City of London and the residents is that of Landlord/Managing Agent and Tenant/Leaseholder, rather than that of service provider and member of the public.

We do not consider tradesmen and delivery drivers to be members of the public for the purposes of the Act and neither do we consider visitors to individual tenants to be so.

In our opinion Part 4 of the Act is clearly designed to govern the relationship between the City of London and its residents rather than the accessibility of the building itself.

### **D3 General Requirements of Part 4 (Premises) Provisions of the Equality Act**

In general terms Part 4 of the Act makes it unlawful for those responsible for the disposal or management of premises to discriminate against disabled residents for reasons relating to their disability.

In addition it does call on responsible bodies to make reasonable adjustments to the terms on which premises are let and the policies, practices and procedures relating to the disposal or management of premises.

Equally there are limited obligations to make reasonable adjustments or to provide auxiliary aids, noting these obligations are far less onerous than those under Section 3 of the Act.

Under Part 4 tenants do have the right to request adjustments to terms or the provision of limited auxiliary aids to their own residences.

#### D4 What is unlawful conduct under the Act?

Sections 35 and 36 both cover management of premises and make it very clear that both landlords and managing agents are “duty holders” under Part 4 of the Act.

As a duty holder it is unlawful for the City of London (hereafter referred to as CoL) to discriminate against or victimise a disabled person for reasons relating to their disability.

Examples of such discrimination or victimisation could involve offering the premises on less favourable terms, by refusing to let or sell the premises or by less favourable treatment generally.

#### D5 The Requirement to Make Reasonable Adjustments

Unlike Section 3 of the Act there is no proactive duty for CoL to make reasonable adjustments.

Under Section 4 the duty to make reasonable adjustments is activated by the request of an existing or prospective tenant or leaseholder.

The Act makes it clear that it will never be reasonable for the duty holder to make an adjustment which involves the removal or alteration of a physical feature, i.e. there is no obligation to make physical alterations.

However, the Act makes it clear that furniture, furnishings, materials and equipment are not physical features for the purposes of the Act and also confirms that the following works will not be considered to be an “alteration of a physical feature”:

- \* The replacement or provision of a sign or notice.
- \* The replacement of a tap or door handle.
- \* The replacement, provision or adaptation of a door bell or door entry system.
- \* Changes to the colour of a wall, door or any other surface.

Thus CoL have no obligation to make proactive alterations to the site generally, save for some very limited alterations as set out above which, in turn, are reactive duties activated by the request of a tenant.

However, the obligation to make reasonable adjustments to policies, practices and procedures as well as the terms of a tenancy agreement should not be underestimated.

#### D6 Tenants Right to Adapt Their Own Premises

Any tenant can request consent for work necessary for the accommodation, welfare or employment of a disabled person.

A landlord cannot reasonably withhold consent and, if the landlord does not

respond within one month, he is automatically deemed to have consented.

The landlord can apply reasonable conditions to any such consent, such as provisions for reinstatement at the end of the term or on vacation.

All costs arising will generally be met by the tenant.

#### D7 Tenant's Rights to Alter Common Parts

CoL has no obligation to make alterations to common parts.

Whilst there is provision within Schedule 4 of the Act to allow tenants to request alterations to common parts this has yet to be enacted as so does not currently apply.

#### D8 What Constitutes a Request From a Tenant?

The Act is not clear as to what constitutes "a request" but guidance published by interested bodies such as the Equality and Human Rights Commission suggest that this may be as simple as a verbal request.

We anticipate that CoL should be proactive in their interpretation and when receiving a request, comment or even complaint in any form a disabled tenant should treat this as a request under the Act.

#### D9 Summary of CoL obligations in respect of Common Parts

As set out previously the relevant section of the Act is Part 4 which relates to the management of premises in this context.

CoL have no obligation to proactively make adjustments to these common parts for disabled users but do have an obligation to make limited minor alterations at the request of a tenant to their residence.

#### D10 What about CoL obligations as a Public Body

Whilst CoL has very little if any obligation to make physical alterations to the property under Section 4 of the Act this does ignore your duty under Section 149 as a Public Body. This requires you to promote equality in everything that you do including access to your property.

Thus dependant on how CoL intends to meet this duty, and the policy that flows from this you may choose, or be bound by your own policy, to take a more positive approach and aim to upgrade the accessibility of this site and your estate generally.

#### D11 Noting your limited obligations we have generally given all of our recommendations a longer term priority (3M or 3R) on the basis that works should be incorporated into your longer term maintenance and refurbishment programs.

## E Audit Findings

### E1 Key to Priority and Cost Bandings

Priorities	Description	Cost Bandings
1	Urgent, low cost or immediate health and safety risk to a disabled user	A £0 - £500
2	As soon as possible (Should not wait til next refurbishment/maintenance cycle)	B £500 - £2500
3M	As part of ongoing maintenance programme	C £2500 - £5000
3R	As part of next refurbishment	D £5000 - £10000
4	When a specific need is identified	E £10000+
EXP	Further specialist advice required	





Photo	Item	Issues	Recommendations	P	£
	<b>1.0</b>	<b>Approach and Car Parking</b>			
	1.1	Our assessment of the approach to the site is limited to those areas within the site boundary and the public highway to the perimeter of the site.  We assume CoL are also the highway authority. Certain elements may actually be public access issues cover by Part 3 of the Act and have been prioritised accordingly.			
	1.2	The temporary hoarding serving what we assume is temporary plant is not particularly well contrasted against the paving posing a risk of collision to some visually impaired users.	Apply contrasting markings at base and head level to hoarding	2	A
	1.3	The dropped kerb points to the service entrance and car park ramp has no tactile blister paving fitted and thus there is a risk that visually impaired users will walk into the carriageway unawares.	Fit tactile 'blister' profile paving to crossing points	2	B

Photo	Item	Issues	Recommendations	P	£
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1.4	The dropped kerb point across Artizan Street has no tactile blister paving fitted and thus there is a risk that visually impaired users will walk into the carriageway unawares.	Fit tactile 'blister' profile paving to crossing point	2	A
1.5	Outdoor seating areas can pose a particular risk of collision to visually impaired person as they tend to be inconsistent with users bags and other items obstructing the pavement.  As a result it is good practice to highlight these areas using contrasted paving or by requiring businesses to cordon off with temporary, well contrasted barriers.	Require tenants to cordon off seating areas	2	Zero




Photo	Item	Issues	Recommendations	P	£
	1.6	<p>The granite planters are poorly contrasted to their surroundings and thus a visually impaired person will be at risk of collision.</p> <p>Contrasting bands should ideally be applied around the head of the planters. A capping could achieve this but a better alternative may be to simply plant more colourful species.</p>	Improve contrast of planters	2	B
	1.7	<p>Granite setts have been used to delineate and highlight cycle parking areas to Harrow Lane. These will provide a useful clue to visually impaired users but the introduction of a highly contrasted surface would improve this further.</p> <p>This will also apply to Gravel Lane. In this instance parking is well positioned between planters.</p>	Install high contrast surface to cycle parking areas	3M / 3R	B
					

Photo	Item	Issues	Recommendations	P	£
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1.8 Similar to outdoor seating A board signs can pose a risk of collision to visually impaired users.

Require A boards to be kept clear of pavements

2 Zero

The signs in place during our visit were generally well contrasted and positioned clear of main pedestrian routes but their use should be controlled.



1.9 City of London bollards have well contrasted markings around the head of each bollard making them easier to identify by a visually impaired person.



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Photo	Item	Issues	Recommendations	P	£
 	1.10	<p>The former entrance steps now serve no purpose but the lack of contrasting nosings does pose a trip hazard to a visually impaired user.</p> <p>The lack of handrails will also make the steps more difficult to use by a mobility impaired person.</p> <p>We suggest these steps are blocked off at each end to prevent access.</p>	Block off former entrance steps	2	B
	1.11	<p>Where goods are displayed on street these present a similar hazard to seating as set out previously.</p> <p>In this instance well contrasted barriers to either end would help to mitigate the risk of collision.</p>	Require tenants to use well contrasted cordons to highlight on street trading areas	2	Zero



Photo	Item	Issues	Recommendations	P	£
	1.12	<p>The intercom points at the car park entrances are set around 1400mm above ground level and are not positioned so as to be within reach of a car.</p> <p>As a result a wheelchair user would have to transfer twice to access the intercoms if indeed he or she could reach them.</p>	<p>Lower and move intercoms and fit signs at car park entrances</p>	3R	B
	1.13	<p>We understand that there is no visitor parking within the car park.</p> <p>Flat occupants can rent spaces and it would be appropriate to discuss any individual requirements for these bays with the occupant rather than creating accessible bays in anticipation unless you create wheelchair accessible units in which case we would then suggest creating accessible bays to complement these.</p>			

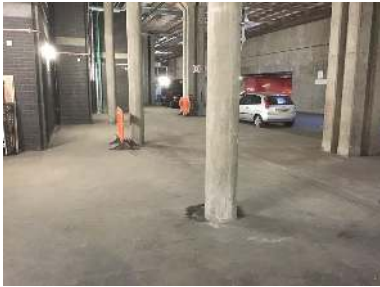


Photo	Item	Issues	Recommendations	P	£
	1.14	<p>The concrete columns to the car park are poorly contrasted to their surroundings and thus a visually impaired person will be at risk of collision.</p> <p>Contrasting bands of at least 150mm in depth should be applied at 1500mm above ground level.</p>	Apply contrasting markings to concrete columns	3R	A
	1.15	<p>Headroom to the basement car park is less than 2.2m when services are taken into account which would not be sufficient for many roof loading adapted vehicles.</p> <p>You already offer parking at ground floor which is a suitable alternative for a resident with roof loading vehicle.</p>			
	1.16	<p>There is stepped access to core 4. There is plenty of space to break this out and replace the step with a short ramp.</p> <p>We'd suggest you aim to achieve 1:21 which is considered a gentle slope for the purposes of best practice.</p>	Form ramp access to core 4 from car park	3R	B
	1.17	<p>When allocating bays to disabled residents thought should be given to their route to the most preferable entrance with bays allocated as close as possible to the</p>			

Photo	Item	Issues	Recommendations	P	£
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appropriate lift core.

This will both limit travel distance and travel along the carriageway areas in what is a potentially hazardous environment.



1.18 Lighting levels to the car parks are generally adequate to the carriageway areas.



1.19 There is little if any contrast between wall and floor surfaces to the basement car park but given the nature of the environment and likelihood of a visually impaired person being here alone we consider there is little merit in addressing this.

**2.0 Entrances**



Photo	Item	Issues	Recommendations	P	£
	2.1	<p>Entrance intercom units are not particularly well contrasted against wall surfaces but call buttons are well highlighted against the faceplate with highly contrasted surrounds.</p> <p>This contrast is supplemented with embossed numbering and braille.</p> <p>The intercom units are generally set with buttons no higher than 1275mm above ground level. This is slightly above the comfortable reach range for the average wheelchair user of 1200mm but are within the upper extended reach range of 1400mm.</p>	<p>Improve contrast of intercom units with contrasted frames or faceplates</p>	3R	B
	2.2	<p>The buttons which are most frequently used are losing the contrasted surround.</p>	<p>Replace damaged contrasted rings to call buttons</p>	3M	A
	2.3	<p>The entrance doors achieve a clear width of at least 845mm which exceeds current best practice standards so should be sufficient for all.</p>			

Photo	Item	Issues	Recommendations	P	£
	2.4	<p>The older entrance doors require excessive force to pull open of more than 50Newtons, as a result it will prove difficult for a user with impaired upper body strength to open these doors.</p> <p>Best practice recommends a maximum opening force of 30Newtons for the first 30 degrees of the door swing and 22.5Newtons thereafter.</p> <p>Closers to these doorsets are likely to prove difficult to adjust for what are old and heavy steel doors. It may be necessary to fit new closers.</p> <p>Whilst you have fitted power assistance to no.1, which will be of benefit to all, many disabled users will be able to pull open a well adjusted manual side hung door.</p>	<p>Adjust door closers to achieve maximum 30Newtons opening force</p>	3M	A
	2.5	<p>Lighting to the entrance lobbies is generally around 130-140 lux.</p> <p>Ideally lux levels would be higher in the lobby to limit contrast upon entry. Lux levels in the region of 300 lux would achieve this.</p>			




Photo	Item	Issues	Recommendations	P	£
	2.6	<p>The powered door to the no.1 entrance does not open to the full 90 degrees thus there is a limited risk of collision with the door edge for a visually impaired person.</p>	Adjust closer to open 90 degrees	<b>3M</b>	<b>A</b>
	2.7	<p>Power assisted side hung doors can pose a risk of collision to a visually impaired user.</p> <p>Thus we suggest that the door swing zone is highlighted using a contrasted landing.</p>	Form contrasted landing to door swing zone	<b>3R</b>	<b>A</b>
	2.8	<p>The rear entrance door to no. 1 entrance is poorly manifested making it difficult to identify by a visually impaired user, putting him or her at risk of collision.</p> <p>Manifestation should be solid colour and be set at around 1500mm above floor level.</p>	Apply manifestation to entrance door	<b>3R</b>	<b>A</b>



Photo	Item	Issues	Recommendations	P	£
	2.9	<p>The entrance door handle is also poorly contrasted against the door frame making it difficult to identify by a visually impaired person.</p> <p>New handles should be of a lever, bar or 'D' handle type and aim to achieve a 30 point difference in light reflectance value with the frame. Knob handles should be avoided.</p>	Fit new well contrasted door handle	3R	A
	2.10	Entrances tend to look very similar and we'd suggest some form of colour coding is rolled out when renewing entrance doors or signage to give an additional aid to orientation for a visually or mentally impaired user.	Colour code entrances	3R	Info
	2.11	<p>The ground floor car park entrance door achieves a clear width of only 705mm measured to the panic bar making it difficult to pass by many wheelchair, crutch and frame users.</p> <p>Best practice recommends a clear width of 800mm for new entrance doors.</p> <p>With a standard lever handle fitted the door would then achieve 765mm clear width which is still below standard but should be accessible to many.</p>	Replace panic bar with lever handle	3R	A




Photo	Item	Issues	Recommendations	P	£
	2.12	<p>This door is exceptionally heavy to open requiring up to 80N of force.</p> <p>The ramp to the tower car park entrance is set at a relatively shallow gradient but we do suggest kerbs are installed to either edge to mitigate the risk of a wheelchair user falling off of the opening edge.</p> <p>Whilst handrails are in place there is no guarding at low level.</p>	Install 100mm kerbs to either edge of ramp	3R	A
	2.13	<p>Lighting to the ramp surface is poor with lux levels as low as 30 at the surface making it more difficult for a visually impaired user to identify key features such as the start and finish of the ramp and handrails etc. In this location best practice recommends that a lux level of 100lux is achieved at the ramp surface.</p>	Upgrade lighting to ramp surface to achieve 100lux at ramp surface	3R	A
	2.14	<p>Doors to this entrance appear to be permanently held open.</p> <p>The slave leaf does pose some risk of collision to a visually impaired user but is well contrasted.</p>			

Photo	Item	Issues	Recommendations	P	£
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2.15 The car park ground floor entrance door achieves a clear width of 805mm which exceeds current best practice standards so should be sufficient for all.

2.16 Transitional lighting is poor as one enters the building from the ground floor car park with lux levels as low as 70lux noted in the stairwell.

This could be temporarily disabling to some visually impaired users who may be far more sensitive to contrast than a non-disabled user.

Upgrade lighting upon entry to the building to achieve minimum 100lux

**3R A**




Photo	Item	Issues	Recommendations	P	£
	2.17	<p>The keypad to the tower stair entrance is poorly contrasted making it difficult to locate by all but particularly a user with a visual or mental impairment.</p> <p>This could be improved by forming a well contrasted frame or surround to the intercom unit or fitting a new well contrasted faceplate.</p>	Improve contrast of keypad	3R	A
	2.18	<p>It is not clear whether the intercoms incorporate inductive couplers which would then transmit audio direct to a users hearing aid.</p> <p>If not in place this should be rolled out when replacing these units.</p>	Fit inductive couplers to intercoms	3R	B
	2.19	Best practice recommends that canopies are fitted over entrances to provide shelter when using the intercom units and door controls.	Fit canopy over tower entrance	3R	B

Photo	Item	Issues	Recommendations	P	£
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**3.0 Signage and Wayfinding**

3.1 Entrance signs generally achieve good contrast against wall surfaces and do give clear indication of flat locations using a simple font. However some capital text is used thus removing the shape of the word making them more difficult to read by all but particularly someone with a visual or mental impairment.

Fit new signs with sentence case text only and larger number

**3R Info**

They would also benefit from a larger number to make it clearer which entrance one has arrived at.

3.2 The entrance signs tend to be mounted between 1650 and 1780mm above ground level which is set above average eye level making them more difficult to read by all.

Re-mount entrance signs at 1500mm above ground level to centreline

**3R A**








Photo	Item	Issues	Recommendations	P	£
	3.3	Older signage tends to use capital text only thus removing the shape of the word making them more difficult to read by all but particularly someone with a visual or mental impairment.  These signs often convey information which is likely of little use to a visually impaired user but should still be replaced in the longer term.	Fit new signs with sentence case text	3R	Info
	3.4	There is no signage to the tower entrance consistent with entrances to the podium units which would be helpful for visitors in particular.	Fit signage to tower entrance	3R	A
	3.5	Lift lobby signs are generally well conceived achieving good contrast against the walls, well contrasted text and a large floor number.			
	3.6	Whilst users will likely be familiar with layout it would present best practice to	Install additional flat number directional signs	3R	B

Photo	Item	Issues	Recommendations	P	£
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install flat number directional signs at each corner or turning point to aid orientation rather than limiting this to lift lobbies.

	3.7	Whilst occupiers will likely be familiar with the location of their flat this cannot be said of visitors.	Install additional signage to guest flats in core 2 from lift 2 and stair	2	A
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Thus we suggest additional signage is installed to the guest flats in core 2.

	3.8	Lift cores are poorly signed from the basement and ground floor car parks and whilst residents will likely be familiar with the layout a simple sign over each exit point would be of benefit to all but particularly someone with learning difficulties or a mental impairment.	Install signs over car park exits	3R	B
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To the basement area this should include directional signage on route as this is a particularly confusing space. Colour coding of entrances and signage will again help orientation.



Photo	Item	Issues	Recommendations	P	£
	3.9	<p>Stencilled floor level signs are used to the tower. These are relatively effective but would be easier to locate by a visually impaired user if mounted on a well contrasted back board but given the likely familiarity of users this is not a high priority.</p> <p>However when replacing finishes or decorating the tower lift lobbies we do suggest you aim to introduce some individuality to make it easier for users to discern which floor they are on such as alternating floor colour by odd and even floor numbers.</p> <p>You have allowed residents to install artwork to some floors which would also provide a useful clue.</p>			
	3.10	<p>At podium level of the tower the stairs do not extend down to the lower floors.</p> <p>We suggest signage is installed here to confirm this and indicate alternative stair access to the lower floors.</p>	<p>Install sign at podium tower core indicating alternative stairs to lower levels</p>	3R	A
	4.0	<b>Lifts</b>			
	4.1	<b>All lifts</b>			




Photo	Item	Issues	Recommendations	P	£
	4.1.1	The lift doors generally achieve a clear width of around 800mm which should be adequate for the majority of users.			
	4.1.2	The control panels could be better contrasted against the lift walls making them more difficult to locate by a visually impaired person.	Fit well contrasted control panels	3R	C
	4.1.3	Buttons are well contrasted with embossed text and braille.			

Photo	Item	Issues	Recommendations	P	£
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4.1.4 The stainless steel finishes to lift cars are not ideal for some visually impaired users but the textured surfaces do help to prevent excess reflection and given that these cars will need to be hard wearing we consider the finishes appropriate in this setting.

**4.2 Podium**



4.2.1 Lift call points could be better contrasted against wall surfaces when mounted direct or into stainless steel plate making them difficult to locate by a visually impaired person.

Install signage or apply contrasting markings to call points to highlight their position

**3R A**

Where they are mounted against directory signs they are well contrasted.

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Photo	Item	Issues	Recommendations	P	£
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**4.3 1 & 3**

4.3.1 The lift cars are 1380mm deep x 1100mm wide which should be adequate for the majority of users.

The dimensions generally meet the minimum requirements of current best practice.

**4.4 2 & 4**



Photo	Item	Issues	Recommendations	P	£
	4.4.1	<p>The lift cars are around 2065mm deep x 1100mm wide which should be adequate for the majority of users.</p> <p>The dimensions exceed the minimum requirements of current best practice.</p>			
	<b>4.5</b>	<b>Tower</b>			
	4.5.1	<p>The lift cars are 1360mm deep x 1350mm wide which should be adequate for the majority of users.</p> <p>The dimensions generally meet the minimum requirements of current best practice.</p>			
	4.6	<p>Lighting is poor to the tower lift lobbies with many dark spots and lux levels as low as around 70lux noted at floor level generally.</p> <p>This will make it more difficult for visually impaired users to navigate the space and avoid obstacles, obstructions and other users.</p>	<p>Upgrade light levels to achieve 100lux at floor level</p>	<b>3R</b>	<b>C</b>

Photo	Item	Issues	Recommendations	P	£
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4.7 A textured and contrasted vinyl is used to the tower lift thresholds. This may prove a useful clue for a visually impaired user and should be maintained on re-covering and perhaps even extended but take care to avoid very dark colours which may appear as a hole in the floor to some visually and mentally impaired users.

**5.0 Stairs**



5.1 The stair nosings achieve adequate contrast where the stairs are clean and well lit but where soiled, in shade or poorly lit they lose their efficacy making it very difficult for a visually impaired person to identify the step edges thus posing a significant trip hazard.

Fit lighter nosings

**3R D**

Nosings should achieve a 30 point difference in light reflectance value to the treads and risers.



Photo	Item	Issues	Recommendations	P	£
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In the longer term lighter nosings would likely achieve a more sustainable solution.

5.2	<p>It was difficult to assess light levels to the podium stairs as these are generally set externally or in glazed enclosures so, in daylight hours natural light is plentiful.</p> <p>However given the number, type and position of luminaires and the marginal lux readings taken during our visit we find it unlikely that 100lux will be achieved at the tread throughout making it more difficult for a visually impaired user to identify key features such as step edges and handrails.</p> <p>Best practice recommends that a lux level of 100lux is achieved at tread level.</p>	<p>Review and install additional luminaires to achieve 100lux at tread to podium stairs</p>	<b>3R</b>	<b>E</b>
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Photo	Item	Issues	Recommendations	P	£
	5.3	<p>Stairs generally have handrails of a suitable profile to either side providing a good means of support for a mobility impaired user and visual clue of the flights.</p> <p>The green colour to the podium and grey to the tower could achieve better tonal contrast against the walls by using a lighter tone.</p>	<p>Paint handrails in contrasting colour</p>	3R	Zero
	5.4	<p>When repainting we'd suggest you consider a different colour to each stair consistent with the colour coding of entrances as set out previously which will give a useful wayfinding clue to a visually or mentally impaired user.</p> <p>Ideally handrails would be warm to the touch as cold rails will prove difficult to grip by some users with sensitive hands such as someone with arthritis but in this setting the low maintenance steel rails do seem appropriate.</p>			




Photo	Item	Issues	Recommendations	P	£
	5.5	<p>The handrails to the base of no. 1 stairs are poorly contrasted to their background making them difficult to identify by a visually impaired person but this lower section does have well contrasted nosings.</p>			
					
	5.6	<p>The external fire escape stairs are not fitted with contrasting nosings making it very difficult for a visually impaired person to identify the step edges thus posing a significant trip hazard.</p> <p>Nosings should achieve a 30 point difference in light reflectance value to the treads and risers.</p>	<p>Fit contrasting nosings to step edges</p>	1	A

Photo	Item	Issues	Recommendations	P	£
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5.7	<p>A small number of stairs have deep section rails only to one side.</p> <p>Ideally these would be supplemented with a tubular rail to match the existing which will be far easier to grip.</p>	<p>Fit additional tubular rails to deep sections</p>	<b>3R</b>	<b>B</b>
5.8	<p>The open bulkhead to the stairs in the podium cycle park area poses a risk of collision to a visually impaired user who may scan the ground for obstacles so be unaware of obstructions at high level.</p>	<p>Guard bulkhead up to head level</p>	<b>3R</b>	<b>A</b>

Photo	Item	Issues	Recommendations	P	£
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5.9



5.10 Ideally handrails should turn down at the ends to prevent catching sleeves but this is only a matter to consider if replacing the rails anyway.

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**6.0 Gardens and Grounds**



6.1 We assume that you maintain the raised planters.

If residents were allowed to cultivate these raised planters with kneespace would allow ease of access by wheelchair users.



Photo	Item	Issues	Recommendations	P	£
	6.2	<p>The picnic benches to the podium level have insufficient kneespace under the table surface to allow their use by most wheelchair users.</p> <p>Wheelchair accessible picnic benches are available.</p> <p>The bench to the lower level does have sufficient space.</p>	<p>Purchase wheelchair accessible picnic bench</p>	3R	A
	6.3	<p>A range of seating opportunities is available with arm and back rests available to a reasonable proportion which will provide a useful means of leverage to an elderly or mobility impaired user.</p>			



Photo	Item	Issues	Recommendations	P	£
	6.4	Nosings to the external steps are losing their efficacy due to soiling of the steps posing a trip hazard to all but particularly a visually impaired user.	Deep clean steps	2	A
	6.5	<p>The external steps to the lower level are not fitted with any handrails and thus there is no means of support for an elderly or mobility impaired person, putting these users at increased risk of accident.</p> <p>Handrails should be fitted to either side to provide a means of support when going up or down to a user with no strength or mobility to one side of the body such as an amputee.</p> <p>New rails should ideally be tubular and between 40-50mm in diameter so that they are easy to grip and should extend a minimum of 300mm beyond the top and bottom steps so they can be gripped before mounting or dismounting the steps.</p> <p>The new rails should also be well</p>	Fit new handrails to either side of steps or single central rails	3R	B




Photo	Item	Issues	Recommendations	P	£
	6.6	<p>contrasted to give a further clue of the flights to a visually impaired user.</p> <p>The ramp serving this lower level achieves a gradient of around 1:16 which should be suitable for most users but the worn felt covering poses a trip hazard to all.</p>	Repair felt covering to ramp	3M	A
					
	6.7	<p>The handrails to this ramp are over 100mm wide making them difficult to grip by a user with impaired dexterity to the hands such as an elderly person with arthritis.</p> <p>New rails should ideally be tubular and between 40-50mm in diameter so that they are easy to grip.</p>	Fit ergonomic handrails to ramp	3R	B






Photo	Item	Issues	Recommendations	P	£
	6.8	The MUGA was closed during our inspection but we see no reason this should not be accessible to all.			
	6.9	Lighting to the external steps and ramp is likely to be poor given the type, number and location of light fittings, making it more difficult for a visually impaired user to identify key features such as step edges, level changes and handrails.	Install lighting to ramp and steps	3R	B
		In this location best practice recommends that a lux level of 30lux is achieved at step level.			



Photo	Item	Issues	Recommendations	P	£
	6.10	<p>The play surface would prove difficult to mount by a wheelchair user but clearly a flush surface would be difficult to achieve given the deck construction.</p> <p>The ramp at the entrance is however set far too steep for safe wheelchair access at around 1:5 posing a risk of tipping to most chair users.</p>	Extend ramp to achieve min 1:12	3R	A
	6.11	<p>Play equipment is colourful with activities at low and high level and seems appropriate for setting.</p> <p>Ideally a level access roundabout or the like would be offered but the solid deck will pose a practical constraint to this.</p>			

Photo	Item	Issues	Recommendations	P	£
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6.12 The bike store does not seem to be used. It is well sited clear of main pedestrian routes but in the longer term we do suggest you use a contrasted marking/ floor paint at the entry to this area to give a means of warning to a visually impaired user.

Apply contrasting markings at entrance to cycle parking area

3R

A

**7.0 Horizontal Circulation**



7.1 Some walkways are relatively narrow at around 790mm pinching down to as little as 710 in some areas.

Gates narrow to as little as 640mm.

This may make these walkways difficult to access by wheelchair users. There is no practical adjustment but this restriction should be recognised when formulating PEEPS for disabled residents.



Photo	Item	Issues	Recommendations	P	£
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7.2		Light levels are poor in and around the lift lobbies with lux levels as low as 20 noted in daylight hours.	Upgrade lighting to lift lobby areas to achieve 100lux	3R	C
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Photo	Item	Issues	Recommendations	P	£
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7.3 Main walkways generally achieve an adequate clear width of around 1500mm widening to well in excess of 1800mm at entrances which is sufficient for two wheelchair users to pass.

Some residents have sited benches, pots and other objects on the walkway do narrow the effective width. However these objects will act as useful waymarkers for users with a mental impairment such as someone with dementia.

Provided these obstructions are not continuous and a clear width of at least 900mm is maintained we do not consider them to pose a significant barrier.

Whilst some walkways narrow to around a metre, making passing difficult there is no practical alteration.

7.4 We noted some buggies stored within the entrance recesses. These were generally set clear of walkways.

As flats are outside of our scope it is difficult to comment on provision for wheelchair/buggy storage which would typically be set within a flat but in the longer term the provision of an external



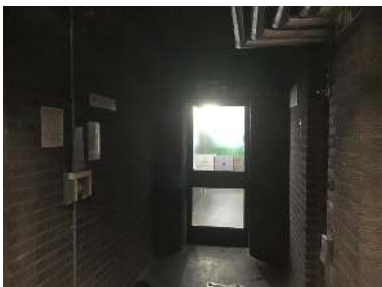
Photo	Item	Issues	Recommendations	P	£
	7.5	<p>socket to these recesses would allow buggies to be charged in these areas.</p> <p>The contrast between wall and floor is poor to lift/stair lobby areas. This will make it difficult for a visually impaired person to navigate these areas as walls will blend in to floors.</p> <p>This is exacerbated by the poor lighting to these areas.</p>			
	7.6	<p>Rubbish chutes to the Podium are generally set at a suitable height but do require a fair amount of force to operate which may make them difficult to use by some disabled users.</p>	Offer collection service to disabled users	4	Zero
	7.7	<p>Lighting is poor to the lobby and corridor linking core 4 to the ground floor car park with lux levels as low as around 25lux noted at floor level.</p> <p>Lighting is also poor to the core 2 entrance point.</p> <p>This will make it more difficult for visually impaired users to navigate the space and</p>	Upgrade light levels to achieve 100lux at floor level	3R	B

Photo	Item	Issues	Recommendations	P	£
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avoid obstacles, obstructions and other users.



7.8

Lighting is poor to the shed corridors with lux levels as low as around 30lux noted at floor level.

Upgrade light levels to achieve 100lux at floor level

**3R**

**B**

This will make it more difficult for visually impaired users to navigate the space and avoid obstacles, obstructions and other users.

Photo	Item	Issues	Recommendations	P	£
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7.9

Access to the refuse chutes in the tower will likely prove difficult for a wheelchair, crutch or frame user due to the restricted door widths on route and lack of manoeuvring space around the chute.

Review access to refuse chutes in tower

**3R /  
EXP**

**E**

To improve access it would be necessary to replace the double lobby doors, which achieve a clear width of only 515mm to one leaf with a single doorset but access to the chute is still likely to prove problematic unless the lobby to the chute can be removed.

We assume the lobby is there for fire compartmentation but suggest this is investigated.

If this cannot be altered it may be appropriate to provide a collection/ assistance service for disabled residents.



Photo	Item	Issues	Recommendations	P	£
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It appears that residents are already leaving bagged rubbish in the lobbies although we assume this is not in accordance with policy as will likely pose a fire risk.

**8.0 Means of Escape**



8.1 You ask that occupiers maintain a clear 'two tile' gap to escape walkways which equates to a clear width of around 600mm.

Main min. 3 tile clear width to walkways

**4 Zero**

This will be too narrow for many wheelchair, crutch and frame users thus may need to be adjusted where disabled residents occupy a flat served by one of these walkways.



8.2 We understand that you have already identified around 5 vulnerable users who may require assistance in the event of fire and their locations are highlighted within a register housed in your secure LFB box.

Put PEEPS in place for disabled residents

**1 / 4 A**

We suggest that this is extended to include a PEEP for each vulnerable resident in accordance with the findings of the Grenfell fire review.

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Photo	Item	Issues	Recommendations	P	£
	8.3	<p>We are please to note that all lifts to both Tower and Podium appear to be fire fighting lifts.</p> <p>Whilst the Grenfell consultation suggests that PEEPS should be capable of implementation without the input of the fire service the consultation is not wholly clear and does seem to suggest that it is recognised this is unlikely to be wholly practical.</p> <p>Thus we suggest that you consult with residents and the fire service to agree use of these lifts for egress in a controlled manner.</p>	Consult on use of fire fighting lifts for evacuation	1	Zero
	8.4	<p>As far as we are aware the residentail units are fitted with self-contained smoke alarm systems only.</p> <p>A fire alarm system has been fitted to the basement and shed levels and we assume some form of plan is in place for evacuation of the site in the event of alarm to these areas.</p> <p>Whilst we did note the odd beacon these alarms seem to generally be fitted with sirens only so there is a risk of a deaf user being unawares in the event of fire.</p>	Fit warning beacons throughout	3R	B


Photo	Item	Issues	Recommendations	P	£
	8.5	<p>In the interim fire marshalls should sweep these areas to ensure deaf users are made aware.</p> <p>Given the amount of staff on site we wonder how practical this would be so you may wish to bring forward the install of beacons.</p>	Instruct fire marshalls to sweep all basement and ground floor areas in the event of fire	1	Zero
	8.6	<p>We did not note any refuges to the site.</p> <p>Whilst lifts are all of fire fighting standard a degree of coordination will be required to ensure a disabled user who cannot manage stairs is not stranded in the event of fire.</p> <p>The Grenfell enquiry does not rule out the use of a stay put policy so it may be that the residences are suitably protected and so can be used as refuges in their own right.</p> <p>We understand that compartmentation is good but do suggest this is reviewed in light of the Grenfell enquiry.</p>	Review compartmentation and use of residences as refuges (stay put)	1 / EXP	A
	8.7	<p>Whilst this may deal with levels from Podium upwards this would not apply to the shed and basement car park levels.</p> <p>We suggest refuges are designated to</p>	Designate refuges to lower floor levels	1	D

Photo	Item	Issues	Recommendations	P	£
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these levels in consultation with the Local Fire Service. Ideally these refuges should be fitted with intercoms to allow users waiting in a refuge to communicate with the chief fire marshal or fire service.

They should also be clearly signed with unique references in order that users can clearly communicate their location.

Lift lobbies typically achieve sufficient space to create a refuge area clear of the main escape route.

**9.0 Internal Doors**

9.1 Doors from lift cores to ground floor car park achieve a clear width of 785mm.

Best practice now recommends that all internal doors achieve a clear width of at least 800mm. Clear width is measured between door stop and the face of the door when held open.

We consider the doors to be within a reasonable margin of best practice standards and likely accessible by most wheelchair users. We find it unlikely it would be considered reasonable to widen the doors in the short term and suggest





Photo	Item	Issues	Recommendations	P	£
	9.2	<p>this issue be addressed when next replacing the door sets.</p> <p>Doors to the storage sheds achieve a clear width of 780mm.</p>	<p>Best practice now recommends that all internal doors achieve a clear width of at least 800mm. Clear width is measured between door stop and the face of the door when held open.</p>		
		<p>We consider the doors to be within a reasonable margin of best practice standards and likely accessible by most wheelchair users. We find it unlikely it would be considered reasonable to widen the doors in the short term and suggest this issue be addressed when next replacing the door sets.</p>			
	9.3	<p>There is insufficient space to the side of the opening edge of the ground floor shed entrance door to allow a wheelchair user to sit to one side and comfortably pull the door open past his or her chair.</p>	<p>Best practice recommends a space of at least 300mm in width but there is an alternative door to the same space which achieves this.</p>		



Photo	Item	Issues	Recommendations	P	£
	9.4	<p>We tested a sample of the internal steel doors and found that, where fitted with self-closing devices, they generally require excessive force to pull open of more than 50Newtons making them difficult to open by a user with impaired upper body strength.</p> <p>Best practice recommends a maximum opening force of 30Newtons for the first 30 degrees of the door swing and 22.5Newtons thereafter.</p> <p>Where they are not fitted with closers, such as to the shed areas they require minimal force so the closers are the issue.</p>	<p>Adjust self-closing devices to achieve maximum 30 Newtons opening force to internal doors</p>	<b>3M</b>	<b>A</b>
	9.5	<p>The double doorsets on route from the basement car park to tower core achieve a clear width of as little as 515mm through a single leaf.</p> <p>This will make them very difficult to operate by many wheelchair users, thus in the longer term we recommend that these double door sets are replaced with door and a half sets to achieve a minimum 800mm clear width through a single leaf.</p> <p>Alternatively, they could be held open on</p>	<p>Replace basement lobby doors with door and a half sets</p>	<b>3R / 3M</b>	<b>C</b>

Photo	Item	Issues	Recommendations	P	£
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magnetic catches linked to the fire alarm but then they would still present a hazard in a means of escape situation and given the age of door it would seem more logical to replace them.



9.6 Flat entrance doors to the tower in particular tend to be poorly contrasted against wall surfaces making the openings difficult to identify by a visually impaired person. The anonymous nature of the openings may also prove confusing to a resident with a mental impairment.

This can be addressed by painting the walls, architraves or doors in a contrasting colour.

A 30 point difference in light reflectance values of adjacent surfaces should be achieved. These values are readily available from paint suppliers.

This is a matter to be dealt with reactively in this setting and the painting of doors would likely prove a reasonable adjustment upon request by a resident.



Photo	Item	Issues	Recommendations	P	£
	9.7	<p>Stair lobby doors to the tower achieve a clear width of only 515mm through a single leaf.</p> <p>This will make them very difficult to operate by many wheelchair users, thus in the longer term we recommend that these double door sets are replaced with door and a half sets to achieve a minimum 800mm clear width through a single leaf.</p> <p>As these doors only serve the chutes an interim measure may be to assist disabled residents unless these areas are proposed to be used as refuges in which case we would give their replacement a higher priority.</p>	Replace stair/refuse lobby doors with door and a half sets	3R	E
	9.8	<p>The tower stair lobby doors at level 3 are poorly manifested making them difficult to identify by a visually impaired user, putting him or her at risk of collision.</p> <p>Manifestation should be solid colour and be set at around 1500mm above floor level.</p>	Apply manifestation to lobby doors	3R	A
<b>10.0 Library</b>					
10.1 The library is outside our scope although we do understand residents can hire					



Photo	Item	Issues	Recommendations	P	£
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rooms here.

The library would likely be the responsible body in any event.

**F Useful Organisations**

## **Useful Organisations**

### **Equality and Human Rights Commission**

EHRC

3 More London

Riverside

Tooley Street

London

SE1 2RG

Tel: 0845 604 6610

Textphone: 0845 604 6620

Web: [www.equalityhumanrights.com](http://www.equalityhumanrights.com)

### **RADAR - Royal Association for Disability and Rehabilitation**

12 City Forum

250 City Road

London EC1V 8AF

Tel: 020 7250 3222

Fax: 020 7250 0212

Minicom: 020 7250 4119

### **Royal National Institute for the Blind**

RNIB Customer Services

PO Box 173

Peterborough PE2 6WS

Tel: 0845 702 3153 - for the price of a local call

Minicom 0845 -58 56 91

Fax. 01733-37 15 55

RNIB Helpline

Tel. 0845-766 99 99 (UK Helpline callers only)

Tel. 020-7388 1266 (switchboard/overseas callers)

Fax. 020-7388 2034

Interpreters available

Textphone users call via Typetalk 0800-51 51 52

### **Action For Hearing Loss**

Head Office

1-3 Highbury Station Road,

London,

N1 1SE

Tel: 020 7359 4442

Textphone: 020 7296 8001

Information Line

Tel: 0808 808 0123 (freephone)

Textphone: 0808 808 9000 (freephone)

SMS: 0780 000 0360

E-Mail: [informationonline@hearingloss.org.net](mailto:informationonline@hearingloss.org.net)

### **Disabled Living Foundation**

380 - 384 Harrow Road

London.

W9 2HU

Tel: 0845 130 9177

Minicom 0870 603 9176

Ref: 16184

email: [info@dlf.org.uk](mailto:info@dlf.org.uk)

Web: [www.dlf.org.uk](http://www.dlf.org.uk)

## **G Glossary of Terms**

## Glossary of Terms

Ambulant	Disabled person who can walk.
BSL	British Sign Language
CIBSE	Chartered Institution of Building Service Engineers
Coir Matting	Matting formed from coconut fibres
Corduroy Landing	Ribbed floor surface which gives warning to visually impaired person as to the position of stairs.
Door Furniture	Door handles, Knobs etc
DTLR	Department for Transport, Local Government and the Regions
Embossed	Symbols or lettering which stands proud of a surface
Gradient	Slope of a ramp or other surface
Induction/ Hearing Loop	Device which converts your voice into a radio or infra-red signal and transmits this direct to a person's hearing aid, or separate receiver, where it is converted back to sound.
Inductive Coupler	In simple terms, an induction loop fitted to a phone.
Illuminance	The light projected onto a surface measured in Lux.
Lever Furniture	Door Handles
Manifestation	Marking to make an object or feature more visible i.e. marking to a glass door or window.
Nosing	Edge of a step tread
Open riser steps	Steps where there is no material in-filling the gap between treads
Rollover Threshold	Door threshold plate with gently sloping edges to allow easy passage by a wheelchair user.



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Project  
Management



Planning  
Consultants



Building  
Surveying



Disabled Access  
Consultancy



## APPENDIX 2 – ACCESS AUDIT SUMMARY RECOMMENDATIONS

Item	Issues Identified	Recommendations
Accessibility equipment	<ul style="list-style-type: none"> <li>• Induction hearing loops were present in many locations but missing from others, such as communal halls and some offices</li> <li>• Visual alarms to alert hearing-impaired people in event of a fire were present in some communal facilities but not in others</li> </ul>	<ul style="list-style-type: none"> <li>• Install hearing induction loops where required</li> <li>• Consider installing visual alarms in communal halls and similar locations</li> </ul>
Accessible toilet and kitchen facilities	<ul style="list-style-type: none"> <li>• Some sites are missing equipment like grab-rails, toilet backrests and door locks or handles which are suitable for those with limited dexterity</li> <li>• Kitchen at Almshouses inaccessible to wheelchair users due to narrow door</li> <li>• Sanitary ware and aids such as grab-rails should contrast with surrounding walls</li> <li>• Emergency pull-cords in some accessible WCs were not hanging loose</li> <li>• Small size of some WCs means bins and other items may cause an obstruction</li> </ul>	<ul style="list-style-type: none"> <li>• Install grab-rails, backrests and other equipment in accordance with recommended specifications</li> <li>• Narrow door should be widened</li> <li>• Contrast wall colours with mobility aids such as grab-rails</li> <li>• Ensure pull-cords are loose and accessible</li> <li>• Ensure bins etc. do not prevent safe use of WCs by wheelchair users and others</li> </ul>
Door entry systems	<ul style="list-style-type: none"> <li>• Some door entry systems did not have appropriately contrasting fascias and buttons, which could make them difficult to use for those with sight impairments</li> </ul>	<ul style="list-style-type: none"> <li>• Door entry systems should be well contrasted against the surrounding wall</li> </ul>

## APPENDIX 2 – ACCESS AUDIT SUMMARY RECOMMENDATIONS

		<ul style="list-style-type: none"> <li>• Contrasted surrounds for buttons should be maintained as it was wearing away on some panels</li> </ul>
Emergency Evacuation	<ul style="list-style-type: none"> <li>• LFB Property Information Boxes ('red boxes') were present at each site and contain information on those requiring assistance in an emergency, but see recommendation regarding PEEPs.</li> </ul>	<ul style="list-style-type: none"> <li>• Personal Emergency Evacuation Plans (PEEPs) were strongly advocated for in the Grenfell Inquiry but are not mandatory, however it is recommended that PEEPs are considered in conjunction with the current Fire Risk Assessment for each building</li> </ul>
Entrance and internal doors	<ul style="list-style-type: none"> <li>• Some doors are too heavy and require more than 30 newtons of force to open</li> <li>• Some doors not appropriately contrasted against surroundings</li> <li>• Full length glass doors do not have contrast stickers to alert visually impaired to their presence</li> <li>• Some doors do not have vision panels (assists people in wayfinding and avoiding collisions)</li> <li>• A small number of entrance doors do not meet minimum width requirement of 775mm (e.g. some doors at Stanley Cohen House and Bowater House)</li> <li>• Power-assisted doors can pose a risk of collision to those with sight impairments</li> </ul>	<ul style="list-style-type: none"> <li>• Recommended that doors adjusted or modified to reduce force required to open, if necessary by installation of door closers, automation or door replacement</li> <li>• Doors and door furniture should be appropriately contrasted against surrounding walls/floors</li> <li>• Glass panels and surrounding windows above certain size should have 'manifestations' (e.g. contrasting stickers or transfers) to alert people to their presence</li> <li>• Certain doors should have viewing panels</li> <li>• It would be beneficial to widen doors which currently do not meet minimum width requirements</li> <li>• Power-assisted doors should have the swing zone highlighted on the</li> </ul>

## APPENDIX 2 – ACCESS AUDIT SUMMARY RECOMMENDATIONS

	<ul style="list-style-type: none"> <li>• Door handles should be well contrasted against the door to assist those with sight impairments</li> </ul>	<p>ground to help avoid the risk of collision</p>
<p>Hallways, landings and communal grounds</p>	<ul style="list-style-type: none"> <li>• Some areas are especially narrow and should be kept clear to enable ease of access for wheelchair users and those with sight impairments</li> <li>• Where possible, minimum width should be maintained</li> <li>• Seating was absent from some communal spaces, e.g. lift lobbies</li> <li>• There are no facilities for storage/charging of mobility scooters on some sites, which can result in them being kept on landings and causing an obstruction or fire hazard</li> <li>• Some bin chute covers are heavy and may present problems for some disabled users</li> <li>• Access to some bin chute areas was restricted due to narrow doors or dual-leaf doors being present</li> <li>• Some uneven paving was identified on a limited number of sites (e.g. William Blake Estate) which could pose a hazard generally but especially to disabled people</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure a process is in place to regularly check these areas for obstructions and ensure removal</li> <li>• Items which might pose a hazard (e.g. litter bins) should be sited away from enclosed areas and be appropriately contrasted with surroundings</li> <li>• Consider installing appropriate seating for ambulant disabled people in areas they may be required to wait (e.g. reception areas, lift lobbies, on routes from nearest car park/bus stop to blocks)</li> <li>• Consider whether storage facilities can be provided for mobility scooters to prevent storage in communal areas</li> <li>• Bin chute covers could be eased, adjusted or upgraded, or alternative means of rubbish disposal considered</li> <li>• Consider replacing dual-leaf doors to bin chute areas</li> <li>• Remedial works to uneven paving should be carried out</li> </ul>

## APPENDIX 2 – ACCESS AUDIT SUMMARY RECOMMENDATIONS

Lifts	<ul style="list-style-type: none"> <li>• Mirrors, which assist wheelchair users when exiting lifts, were not present in some lift cars</li> <li>• Lift buttons did not contrast with surroundings in some lift cars</li> <li>• Contrasting flooring was not present in lift lobbies in surveyed locations</li> <li>• Procedure for maintaining/servicing lifts and responding to breakdowns must take account of these facilities being main (sometime the only) way for disabled people to enter/exit their home and should be regular enough to minimise breakdowns</li> </ul>	<ul style="list-style-type: none"> <li>• Install mirrors in specified lifts</li> <li>• Ensure lift buttons contrast with surroundings to assist people with sight impairments</li> <li>• It is recommended that contrasting flooring is provided in lobbies to help people locate the lifts</li> <li>• Ensure that lifts are maintained robustly to minimise breakdowns. Procedure should be in place to ensure that breakdowns are responded to with sufficient urgency to minimise impact on disabled people</li> </ul>
Lighting	<ul style="list-style-type: none"> <li>• Lighting in some locations may not be sufficient for those with sight impairments (e.g. Middlesex Street – entrance from car park to Tower, some shed areas on different sites)</li> </ul>	<ul style="list-style-type: none"> <li>• Checks should be made to ensure that lighting is adequate in hallways, walkways and open areas, during hours of darkness</li> <li>• Lighting should be upgraded as required to meet minimum standards of illumination</li> </ul>
Parking Facilities	<ul style="list-style-type: none"> <li>• Disabled parking bays were not present at some sites</li> <li>• Garages at many sites not accessible by current standards</li> <li>• Where present, disabled parking bays should be appropriately signed</li> </ul>	<ul style="list-style-type: none"> <li>• Create disabled parking bays compliant with accessibility dimensions</li> <li>• Consider providing accessible garages as part of any refurbishment or redevelopment</li> <li>• Install signage for disabled parking bays</li> </ul>

## APPENDIX 2 – ACCESS AUDIT SUMMARY RECOMMENDATIONS

Procedures	<ul style="list-style-type: none"> <li>• No process at most sites for identifying visitors who might require assistance in an emergency</li> <li>• Unclear if there is a process for checking effectiveness of escape strategies, especially for those with mobility issues</li> </ul>	<ul style="list-style-type: none"> <li>• Sign-in process should be considered to identify people who may require assistance (e.g. in a fire evacuation)</li> <li>• Escape strategies should be clear and subject to testing, including for visitors</li> </ul>
Ramps	<ul style="list-style-type: none"> <li>• Some ramps are not appropriately contrasted to warn users of gradient change</li> <li>• Additional edging protection and handrails required on some ramps</li> <li>• Some ramps have surfaces which might be slippery when wet (e.g. bitumen felt which has worn away)</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure ramps have appropriate contrasting to warn users of change in gradient</li> <li>• Add edging protection and handrails to some ramps depending on dimensions and location</li> <li>• Consider whether surfaces are suitable and non-slip</li> </ul>
Signage and Wayfinding	<ul style="list-style-type: none"> <li>• Some sites lack adequate signage to direct people to key facilities, such as estate offices and communal halls, which would help generally and be of particular benefit to those with mobility issues and hearing impairments</li> <li>• Some buildings have accessible entrances and exits which are not clearly marked</li> <li>• Some signage is affixed at too high a level</li> <li>• Certain signs have unclear lettering or use capital letters, which can be harder to read by those with sight impairments</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure adequate signage is present to direct residents and visitors to key facilities</li> <li>• Signage should be mounted at a suitable level to be readable and use appropriate lettering</li> <li>• Accessible entrances and exits should be clearly signposted</li> </ul>

## APPENDIX 2 – ACCESS AUDIT SUMMARY RECOMMENDATIONS

Staircases and steps	<ul style="list-style-type: none"><li>• Contrasting nosings not present at some sites</li><li>• Tactile paving not present in some locations</li><li>• Handrails present only on one side of staircases or steps</li></ul>	<ul style="list-style-type: none"><li>• Ensure tactile paving and stair nosings are present and contrast appropriately with surrounding steps</li><li>• Staircases or steps with certain dimensions require handrails on each side, ensure that these are fitted</li></ul>
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