

Housing Directorate 222 Upper Street, London N1 1XR

Report of: Corporate Director for Housing

Meeting of:	Date	Wards
Housing Scrutiny Committee	19 March 2019	All
Delete as appropriate	Exempt	Non-exempt

SUBJECT: Fire Safety in Council Housing – 12 Month Update

1 Synopsis

1.1 On 22 March 2018 the Executive received a report from the Housing Scrutiny Committee regarding fire safety in Council housing. The report provided recommendations to improve fire safety within the Council's domestic housing stock, including properties currently managed by Partners for Improvement in Islington (PFI). Subsequently, on 11 June 2018, the Executive agreed its response to the recommendations set out in the scrutiny report, to further improve the management of fire safety in Council housing. This report updates the Housing Scrutiny Committee on progress with the recommendations agreed by the Executive.

2 Recommendation

2.1 To note the progress made as set out in section 4 of this report.

3 Background

- 3.1 In July 2017 the Housing Scrutiny Committee commissioned a review of the Council's and Partners for Improvement's fire safety management arrangements. The review ran from July 2017 until January 2018. Evidence was received from a variety of sources, including
 - Evidence from Council officers;
 - Evidence from witnesses, including London Fire Brigade (LFB);
 - Documentary evidence, including from Partners for Improvement in Islington (PFI); and
 - Scrutiny visits, including networking meetings and London Build Expo Fire Safety Summit

3.2 The Housing Scrutiny Committee issued a final report on 30 January 2018 which included twentyone recommendations. The Executive agreed its response to the recommendations in the report from the Housing Scrutiny Committee on 11 June 2018 and progress made with each of the recommendations is set out in section 4 below.

4 Recommendations and Service Update

4.1.1 **Recommendation**: Islington Council should follow all relevant recommendations for local authorities and social landlords arising from the Grenfell Tower inquiry and the Independent Review of Building Regulations and Fire Safety, and any fire safety guidance issued by the Local Government Association

Response: The Council has been following all relevant guidance issued by the Ministry for Housing, Communities and Local Government and the London Fire Brigade since the Grenfell tragedy. The Council is currently considering the potential implications of Dame Judith Hackitt's review into the regulatory framework relating to fire safety, following its publication in late May 2018 and awaiting the outcome of the Grenfell Tower inquiry.

12 Month Update: The public inquiry is ongoing and the full outcome is unlikely to be clear for some time yet. The Council has adopted interim guidance in the interim, for example in respect of cladding systems other than Aluminum Composite Material (ACM). This was demonstrated with the removal of EPS cladding at Fyfield on the Six Acres Estate, which has now been completed. The government response to Dame Judith Hackitt's review has now been published, although how changes will be implemented, the remit of new regulatory bodies i.e. the Joint Competence Authority (JCA); the level of information required to be held/submitted to the JCA; and timescales for implementation all remain unclear. The Director Housing Property Services will establish a working group to look at the implications of the new arrangements and how the Council will fulfil its new/amended duties

4.1.2 **Recommendation**: Following the conclusions of the Grenfell Tower inquiry, the review of the Equality and Human Rights Commission, and the Independent Review of Building Regulations and Fire Safety, a report should be submitted to the Housing Scrutiny Committee detailing what actions the council will be taking in response to the recommendations.

Response: A report detailing actions the Council will take following the conclusion of all fire safety related reviews, inquiries and updated guidance will be provided to the Housing Scrutiny Committee in due course.

12 Month Update: As above in 4.1.1. difficult to provide further comment at this stage.

4.1.3 **Recommendation**: The Housing Scrutiny Committee notes the London Fire Brigade's continued support of the 'Stay Put' policy. Islington Council should clearly communicate the London Fire Brigade's advice to tenants and leaseholders, and promote understanding of when residents should 'Stay Put' and when they should evacuate. Guidance on this should be available in a range of languages and should be displayed in prominent areas.

Response: Bespoke Fire Action Notices for all types of Islington Council properties have been created in conjunction with the Council's communications team and will be installed in the common areas of housing properties in due course. Information contained within the new tenant guide and the Council's website will be reviewed periodically to ensure it provides the most suitable advice, which is wherever possible, block specific. Additional forms of communicating fire safety messages will also be considered.

- **12 Month Update**: The final artwork for Fire Action Notices is now completed, funding allocated and materials ordered through the Councils internal print services. It is envisaged that Fire Action Notices will be erected incrementally by the Estate Maintenance Team in Homes and Communities. Initial priorities will be high rise blocks (6 storey and above) and converted street properties, the latter due to changes in the fire strategy for the building(s) arising from the installation of interlinked detection and warning systems. The guidance provided within the new tenant sign-up pack can already differentiate between fire strategies depending on the building, providing bespoke advice to residents. The communication of this falls within the remit of Homes and Communities at sign-up stage. New tenants are also offered a Home Fire Safety Visit (HFSV) from LFB as part of the sign-up process.
- 4.1.4 **Recommendation**: The council should maintain the dedicated email address for residents to report fire safety concerns to the council. This should be displayed in prominent locations and promoted regularly. This information should also be provided to new tenants in a welcome pack

Response: The Firesafety@islington.gov.uk email address has been established as a conduit for resident concerns, enquiries or requests for advice and is referenced in the new tenant guide. This email inbox is monitored on a daily basis to ensure a prompt response to any correspondence. We are also investigating additional, electronic means by which residents can communicate with us on fire safety matters or highlight concerns, including web-based surveys.

- **12 Month Update**: The dedicated fire safety inbox has proved valuable and is providing residents with a means by which to raise fire safety concerns or questions. This appears to be operating well and concerns are logged and reviewed periodically for trends.
- 4.1.5 **Recommendation**: Islington Council should work with vulnerable and disabled tenants and leaseholders to co-produce personalised emergency evacuation plans. These must be realistic and achievable. Any remedial works or adaptations that are required to facilitate safe evacuation should be carried out as soon as possible.

Response: Personalised emergency evacuation plans (PEEPs) are commonplace in most workplace buildings (and sheltered accommodation facilities) but are typically reliant on the presence/intervention of a member of staff to execute the plan. It is unlikely to be feasible that such plans, with a reliance on a member of Council staff, can be implemented in general needs housing. Current guidance considers this 'an unrealistic expectation on landlords' and there would be significant resource implications, in particular for Homes and Communities. Vulnerability data is currently being reviewed for complex blocks, with a view to providing this to LFB via a Premises Information Box (PIB), enabling the fire service to prioritise vulnerable residents as dictated by operational necessity. An evaluation of the use of PIBs will be provided to the Housing Scrutiny Panel in due course.

12 Month Update: *LFB* and current government guidance still consider that PEEPs will not be feasible (or required) in general needs, purpose built blocks of flats or even converted street properties, largely as such premises are not staffed and a PEEP could not be operated effectively. Premises Information Boxes have been installed at Braithwaite House, Perth House, Selkirk House and Fyfield, which include block layout drawings to aid the fire service in an emergency, but also indicated (in line with data protection requirements) the most vulnerable properties that may need to be prioritised for evacuation, depending on the fire situation presented. This pilot scheme will run until the end of April 2019, during which time local LFB crews will visit each location to assess the level of information provided and its usefulness in a real emergency scenario. Homes and Communities are reviewing their processes to ensure resident data is kept up to date and refreshed periodically, including through day to day contact with service users.

4.1.6 **Recommendation**: Islington Council should encourage Partners for Improvement in Islington, TMOs and Housing Associations operating in the area to co-produce personalised emergency evacuation plans for their disabled and vulnerable residents, and carry out remedial works or adaptations as necessary.

Response: The Council's approach to ensuring the fire safety of vulnerable residents will be discussed, agreed and implemented via the Homes and Estates Safety Board, which has an independent chair and is attended by representatives of Partners. Once agreed, the Council's approach will be shared with Partners in the interest of consistency.

- **12 Month Update**: As. 4.1.5 the introduction of PEEPs is still considered an unreasonable burden on landlords, but more importantly would be very difficult to implement effectively in practice. Where interlinked detection/warning systems are installed to support a simultaneous evacuation strategy, this will be completed in conjunction with residents. Residents who may consider themselves incapable of evacuating the property in an emergency (including the common areas) will be offered all necessary support by Homes and Communities, including possible adaptations to the property and/or potential rehousing where this may be considered appropriate.
- 4.1.7 **Recommendation**: Islington Council should maintain an up-to-date list of vulnerable council tenants and leaseholders who may need assistance to evacuate and make this available to the London Fire Brigade and Emergency Planning service. This should detail their flat number and floor, and the assistance they require. This information should be kept in a secure information box at the premises.

Response: Vulnerability data is kept by both Adult Social Care and Childrens Social Care on the LAS system, and we can investigate whether it is feasible to make this available to LFS and the Emergency Planning service. There is no obligation for residents to routinely inform the Council of any disability which may be affecting them and as such any information is likely to be incomplete or resource intensive to maintain. Poor quality information could potentially (and unnecessarily) endanger the life of fire and rescue service personnel. The implications of this and of the General Data Protection Regulations (GDPR) coming into effect in May 2018 must be fully considered, as well as the most effective means of gathering such data from residents. We regularly liaise with the LFB on this to ensure that they are satisfied with our support for their operational needs.

- **12 Month Update**: The provision of data from the LAS system has been investigated, but is not considered a viable option at the current time. Homes and Communities are reviewing their arrangements for ensuring that vulnerability data is maintained (and updated) accurately through day to day routine contact with residents, as far as reasonably practicable
- 4.1.8 **Recommendation**: Islington Council should encourage Partners for Improvement in Islington, TMOs and Housing Associations operating in the area to make information available to the London Fire Brigade and Emergency Planning service on the location and assistance needs of vulnerable residents.

Response: The Council's approach to ensuring the fire safety of vulnerable residents will be discussed and agreed via the Homes and Estates Safety Board, which has an independent chair and is attended by representatives of Partners. Once agreed, the Council's approach will be shared with Partners in the interests of consistency.

12 Month Update: Discussed at the Homes and Estates Safety Board (Fire Safety) in February 2019, although it is unlikely the installation of PIB's to keep data secure will be feasible in respect of all but the largest of converted street properties. See also 4.1.5

4.1.9 **Recommendation**: Islington Council and the London Fire Brigade should explore the feasibility of developing a secure electronic solution to accessing the location and assistance needs of disabled and vulnerable residents in an evacuation.

Response: The development of a secure electronic system is likely to require significant resources. As a London (and UK) wide issue, the development of such a system may need to be led by the London Fire Brigade, to capture data not only from housing providers in Islington but across London. The use of LFB's existing IT systems for this is currently being explored but, even if feasible, it is unlikely to have the capacity required.

- **12 Month Update**: We retain the view that any such system would need to be facilitated by LFB as a Pan-London issue and to ensure consistency and appropriateness of data. See also 4.1.5
- 4.1.10 **Recommendation**: Islington Council should consider retrofitting sprinkler systems in all high rise housing blocks. The council should review the feasibility of installing sprinklers, the anticipated cost of the works, and model the financial impact of the works on other aspects of the housing service

Response: The Council continues to review its position on the retro-fitting of suppression systems in its housing stock, due to the number of challenges such a programme of work is likely to present. The findings of the Grenfell Tower inquiry, Hackitt review of the regulatory framework and updated fire safety guidance will be considered in formalising the Council's position.

- **12 Month Update**: The retro-fitting of suppression systems such as sprinklers remains a consideration, which is likely to be dictated by the final outcome of the Grenfell Inquiry. Initial work on the feasibility and costs of installing sprinkler systems has been carried out by Housing Property Services, which are broadly similar to our initial estimates. It is unclear how successful the retrospective installations of suppression systems have been in other boroughs, although this is being monitored through the London Council's Directors Fire Safety group. Suppression systems are being installed in high rise new build accommodation i.e. Redbrick as a matter of good practice, even where this is not a requirement under the current Building Regulations.
- 4.1.11 **Recommendation**: Islington Council should make representations to the government that the cost of retrofitting sprinkler systems and carrying out any necessary fire safety works in local authority housing should be met by central government, given that no additional funds have been allocated to date.

Response: The Ministry for Housing, Communities and Local Government (MHCLG) has recently indicated that some costs associated with remediation work on ACM-clad blocks will be financed by central government. We are in contact with MHCLG about reclaiming the costs of cladding removal and recladding work at Braithwaite House. The funding of fire safety improvements arising from the Grenfell tragedy is being discussed collectively by the London Councils Fire Safety group, which is attended by Islington Council's Director of Housing Property Services. The Executive Member for Housing and Development and the chair of the Housing Scrutiny Committee have written a joint letter to government on this matter.

12 Month Update: Islington Council has now received financial support from MHCLG in respect of the ACM cladding removal work carried out at Braithwaite House. No further funding has currently been made available by central government to carry out fire safety improvements and whilst the London Council's Directors Fire Safety Group continue to pursue this, it is considered unlikely to be successful and funding would need to be provided from existing budgets. At present the Council is prioritising the repair, upgrade or replacement of existing general fire precautions i.e. fire doors, firestopping works and detection/warning systems where they will have the greatest positive impact on resident safety.

4.1.12 **Recommendation**: The Housing Scrutiny Committee supports the zero tolerance approach to keeping items in communal areas adopted by Islington Council and Partners for Improvement in Islington. The Committee would support more targeted communications being issued to residents where problems persist.

Response: The zero tolerance approach to common areas is being managed by Homes and Communities, with the Council's Fire Risk Assessment (FRA) template being amended to reflect this change in policy. Targeted correspondence continues and where offenders are identified, action under conditions of tenancy may also be considered as appropriate.

- **12 Month Update**: A policy of zero tolerance in respect of resident belongings stored in the common areas has been implemented for blocks which are fully or substantially enclosed, which is considered risk proportionate. Initially proving unpopular with residents, Homes and Communities have persisted with enforcement as required and the level of resident acceptance is increasing. A programme of routine inspections of converted street properties will also adopt the same principles in respect of resident storage. An exercise to obtain keys to all street properties (main entrance door only) is also underway by Homes and Communities, which will be a considerable help in this respect, as well as aiding the Council to fulfil its obligations in other areas which may impact on resident health and safety.
- 4.1.13 **Recommendation**: Islington Council should consider if a suitably qualified and experienced fire engineer is needed to supplement the risk assessment work carried out by the council's in-house fire safety officers. This may provide additional reassurance that fire risks are being managed effectively.

Response: The Council already engages with competent, external fire safety consultants where this is considered necessary. The Council is also investigating 3rd party accreditation schemes for fire risk assessment, which would include an independent, expert overview and quality sampling of FRAs completed by the Council's in-house team, in order to provide additional reassurance to residents. In addition, the Council is in the process of recruiting an additional Building Control Officer to provide expert advice and assistance to project teams on the Council's range of construction activities. It is acknowledged that construction work has the potential to compromise fire safety, but also brings opportunities to improve both passive and active fire safety measures when the opportunity arises. The ISO9001 Quality Management System (QMS) is likely to be reviewed and updated, to ensure a robust, consistent approach is applied to construction work which could impact on fire safety.

12 Month Update: The Council has engaged with various service providers in recent months, to carry out FRA of more complex blocks and/or situations since Grenfell and this will continue. We are also reviewing how FRA will be completed for properties that will fall under the remit of the JCA, which are high risk residential building (HRRB's) of 10 storeys and above. It may be that external providers are commissioned to complete FRA the Councils properties falling into this category in 2019. It has been agreed through the Director of Housing Property Services that intrusive FRA surveys (including a sample of dwellings) will be completed in advance of future capital works, to inform the work programme. Intrusive sampling is also being carried out as part of the void property process, with issues arising being actioned as necessary.

4.1.14 **Recommendation**: The council should consider consulting a suitably qualified and experienced fire engineer at the design stage of new build projects. This would help to ensure that properties are designed to the highest possible safety standards.

Response: The Council already engages with competent fire engineers through the design/planning phase of new build projects, although arrangements in this regard will be reviewed to ensure they are sufficiently robust and appropriate. The outcome of the Grenfell inquiry and regulatory framework review will need to be considered as part of this process.

- **12 Month Update**: This process is already embedded within the new build team, although implications from the Grenfell Inquiry will need to be considered in due course. Suppression systems are being installed in high rise new build properties, irrespective of whether this is a requirement of the current Building Regulations.
- 4.1.15 **Recommendation**: Given that hoarding can be a fire hazard, the council should further promote the services available to help hoarders, and consider installing mobile sprinkler systems in the homes of vulnerable people who are known to hoard.

Response: The Council will continue to work closely with the London Fire Brigade on initiatives where funding may be available to support vulnerable residents through the installation of mobile suppression systems or other appropriate intervention or protective measures. The Council continues to lead the way in innovative approaches to dealing with hoarding. The hoarding panel meets quarterly to discuss serious cases and provide the appropriate support required. We will increase the publicity around the work of this panel, particularly among partners such as TMOs, Coops, etc.

- **12 Month Update**: Close working relationships with LFB continue and bids will be made for further funding as this becomes available. Previous funding has been used to provide fire retardant bedding, curtains and furniture etc. to some of the borough's most vulnerable residents. Some funding remains available for similar measures, with potential recipients discussed at the hoarding panel, which continues its work to provide support and intervention as required.
- 4.1.16 **Recommendation:** Housing Services should work further with the Seasonal Health Intervention Network (SHINE) to target interventions at vulnerable residents who are known to light their homes through candles rather than electricity.

Response: The use of candles as a means of heating/lighting has been implicated in a number of fires in Council properties in recent years and the implementation of this recommendation will be led by Homes and Communities. Other temporary forms of heating such as portable LPG gas may also present a significant fire risk, as well as the potential carbon monoxide poisoning and should also be considered.

12 Month Update: Homes and Communities regularly refer residents to the council's SHINE support network and use other services such as SHP or social services to work with and support our most vulnerable residents. Training is also being developed for staff who work on or around our properties, enabling them to be extra vigilant and proactively identify those who use candles or other less safe ways of lighting their homes.

4.1.17 **Recommendation**: The council should routinely monitor if communal area fire doors and front entrance fire doors are working correctly

Response: Regular inspections of communal fire doors are carried out by estate services staff within Homes and Communities to ensure doors are in good condition/working order and/or raising repair works orders as necessary. Additional training on this will be provided to estate services and caretaking staff in due course.

12 Month Update: This valuable work by Homes and Communities continues, with estate services staff highlighting repairs issues and the Estate Maintenance Team completing reactive repairs in respect of communal fire doors and other safety measures. The introduction of the Fire Safety Forum has helped with the coordination and prioritisation of works between Homes and Communities and Housing Property Services, predominantly where costly repair works are considered unlikely to be effective in the longer term. A number of blocks have received significant capital funding to facilitate more lasting, effective repairs and improve the overall level of safety.

Training has been carried out with Homes and Communities employees, including Fire Risk Assessment training and course on the Purpose Built Blocks of Flats guidance document. A course on the principles of fire engineering has also been procured, with Housing Property Services staff including responsive repairs, voids, fire safety and capital programme attending over the course of 2019. This will add significant value and increase the organisational competence in respect of fire safety matters and overall resident safety.

4.1.18 **Recommendation**: To allow the fire safety features of properties to be easily monitored, the housing asset management plan should be revised to detail the fire safety features of components.

Response: The Council's current strategy, whilst due a review, has adequate provision to demonstrate that we cover the fire safety features of building components. The expected level of detail to be retained has increased post-Grenfell. Steps have been, and are continually being taken, to increase our detailed knowledge of building materials and components. There are significant difficulties in obtaining legacy data about specific details/materials, but all efforts are being taken to get better data to inform any potential risks. Any review of the Council's process in this regard will be conducted in accordance with the findings of the Grenfell inquiry and any new regulatory requirements.

12 Month Update: The Housing Investment/Asset Management team are recording data gathered through the Voids Housing Health and Safety Risk Rating (HHSRS) assessments, to inform future schedules of work. In respect of information recording, it is likely there will be further recommendation and expectation on completion of the Grenfell Injury and the Council is currently considering IT developments that will help fulfil the (potential) requirements of the JCA, but it is unclear the extent of these at the current time. This particular issue is being monitored though the London Council Directors fire safety group, which the Director of Housing Property Services attends.

4.1.19 **Recommendation**: Dry risers in the council's housing blocks should be checked for damage regularly. Staff on estates should be encouraged to report any visible damage or vandalism which would affect their functioning.

Response: Dry and Wet Rising Main installations are inspected, tested and maintained by the Council in line with current British Standards. A visual inspection of such installations (including access to them) is also included in the periodic inspections carried out by Homes and Communities. Additional training on this will be provided to estate services and caretaking staff in this regard in due course, including ways to report any identified defects or concerns.

- **12 Month Update**: The level of general awareness has been raised significantly within Homes and Communities staff groups, particularly those responsible for inspecting the housing stock, through training and awareness. There is routine engagement between the fire safety team and the local area housing office teams, in addition to the Fire Safety Forum meeting being established. This quarterly meeting reviews FRA actions, current issues and potential future developments in fire safety or arising from the Grenfell Inquiry etc. The installation of a new rising main has been completed at Michael Cliffe House, and the installation at Peregrine House is due to be completed in early Summer 2019.
- 4.1.20 **Recommendation**: Housing services should maintain a register of fires in council housing. It is suggested that this register is backdated for ten years. Recording the cause, extent, and other details of fires may help to inform the council's fire prevention work.

Response: The register of Council/PFI fire incidents has now been established with assistance from the London Fire Brigade. A log of recent fire incidents is now incorporated into the quarterly Homes and Estates Safety Board compliance report, which is also presented to the Council's Corporate Management Board periodically. Unfortunately, the LFB data recording system cannot separate Council/non-Council properties and therefore backdating the register for 10 years would involve a significant level of resource. A review of the combined historical data may still be a useful tool in establishing trends and informing discussions with the LFB on future prevention strategies.

- **12 Month Update**: This process is now embedded. The Homes and Estates Safety Board monitor trends with key findings reported to CMB via the annual health and safety report.
- 4.1.21 **Recommendation:** The Director of Housing Needs and Strategy should author a report to the Housing Scrutiny Committee detailing her experiences and any learning points from her secondment to the Grenfell Response Team and the Royal Borough of Kensington and Chelsea.

Response: This will be requested of Maxine Holdsworth although the committee should note that Maxine is currently extremely busy fulfilling her important role overseeing the rehousing of Grenfell residents.

12 Month Update: With Maxine Holdsworth's return to Islington in March 2019, it is likely this recommendation will be addressed in due course.

5 Implications

5.1 Financial Implications

Costs arising in respect of fire safety measures recommended, agreed & implemented relating to the increase in staffing, equipment, training, IT & communications have been accommodated within overall existing HRA resources.

Many of the recommendations are still under review and as such cannot be assessed in terms of potential costs until those reviews are complete.

The most significant of which relates to items 4.1.10-4.1.11 relating to the retrofitting of sprinklers in high rise blocks which could give rise to extremely high costs that if funded by Islington's HRA would certainly require a programme of compensating savings.

5.2 **Legal Implications**

Fire safety in residential accommodation is currently regulated by Part 1 of the Housing Act 2004 and the Regulatory Reform (Fire Safety) Order 2005. The Order only has limited application to residential properties applying to the common parts and exterior but not within individual flats. As freeholder, the council is responsible for assessing fire safety in its properties, taking such general fire precautions as may reasonably be required in the circumstances of the case to ensure that the premises are safe. Under Part 1 of the 2004 Act, the council is empowered to take action in respect of substandard and dangerous conditions through application of the Housing Health and Safety Rating System which is a risk-based evaluation tool to help identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. The council is required to take action where a category 1 hazard is identified.

The collection and sharing of personal data in respect of vulnerable residents must comply with the requirements of the General Data Protection Regulation and the Data Protection Act 2018. Sharing of personal data with the London Fire Brigade would normally be pursuant to a data sharing agreement.

Legal advice and assistance will be provided to Housing Services as necessary in respect of the implementation of the recommendations.

5.3 Resident Impact Assessment

The council must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment and victimisation, and to advance equality of opportunity, and foster good relations, between those who share a relevant protected characteristic and those who do not share it (section 149 Equality Act 2010). The council has a duty to have due regard to the need to remove or minimise disadvantages, take steps to meet needs, in particular steps to take account of disabled persons' disabilities, and encourage people to participate in public life. The council must have due regard to the need to tackle prejudice and promote understanding.

Where the proposals in this report may have equalities implications and other implications for residents. Resident Impact Assessments (including assessment of equalities implications) will be undertaken as part of the process of developing and implementing policies and actions arising from this report.

5.4 Environmental Impact Assessment

There are no significant environmental implications associated with this report. Any works that come about as a result of the recommendations (e.g. installation of fire suppression systems) will be assessed on an individual basis when the relevant board reports are produced.

6. Conclusion and reasons for recommendations

The Committee is asked to note progress made with implementation of the recommendations.

Final report clearance:

Signed by:

Maxine Holdsworth - Corporate Director for Housing Date: 08 March 2019

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