Hexagon

Property Safety Strategy

Strategy Owner	Head of Property Safety
Prepared by	Operations Director
Approved by	Directors Group Hexagon Board
Approved date	May 2024
Date of next review	May 2025

1. Values and Objectives

1.1. This strategy sets the direction for Hexagon's compliance activity over the next 3 years.

1.2. The strategy includes a high-level action plan which will feed into the organisation's Annual Delivery Plan, annual Property Safety Team Plan, and individual team member objectives within their annual performance management review.

1.3. Progress against the strategy will be monitored by the Hexagon Board's Customer Services and Investment Committees and reviewed annually on the anniversary of its approval by the Hexagon Board of Management.

1.4. Performance against the compliance related Tenant Satisfaction Measures and wider suite of performance indicators is also reported to the Hexagon Board of Management quarterly and to the organisation's Directors Group monthly.

1.5. The focus of the strategy is on ensuring and maintaining health and safety compliance, remediating external wall construction/cladding issues, and ensuring adherence with the Fire Safety and Building Safety Acts as per the strategic and operational objectives set out within the strategy.

1.6. For the purpose of this strategy the term 'property safety' relates to the management of residential buildings to ensure in so far as is reasonably practicable that risks related to buildings, including their structure, are properly and competently managed to protect the safety of residents.

1.7. The intention of Hexagon is to manage the risks to residents and others in a reasonable and proportionate way. It is not practical or possible to ensure buildings are fully 'safe' or free from any risk, however all reasonably practicable steps will be taken to reduce risk in line with all relevant legislation, associated guidance and best practice.

1.8. Scope

Within the scope of this strategy are landlord health and safety activities that relate to residents in their homes and communal areas. This involves ensuring that safety inspections and associated work are undertaken in the following areas: -

- Asbestos
- Electrical and mechanical systems / installations
- Fire
- Fire doors
- Gas
- Lifts
- Water

Landlord health and safety activity also extends to ensuring compliance with the requirements of the Building Safety Act 2022, in particular the production of Building Safety Cases and Reports and ensuring that these records are maintained.

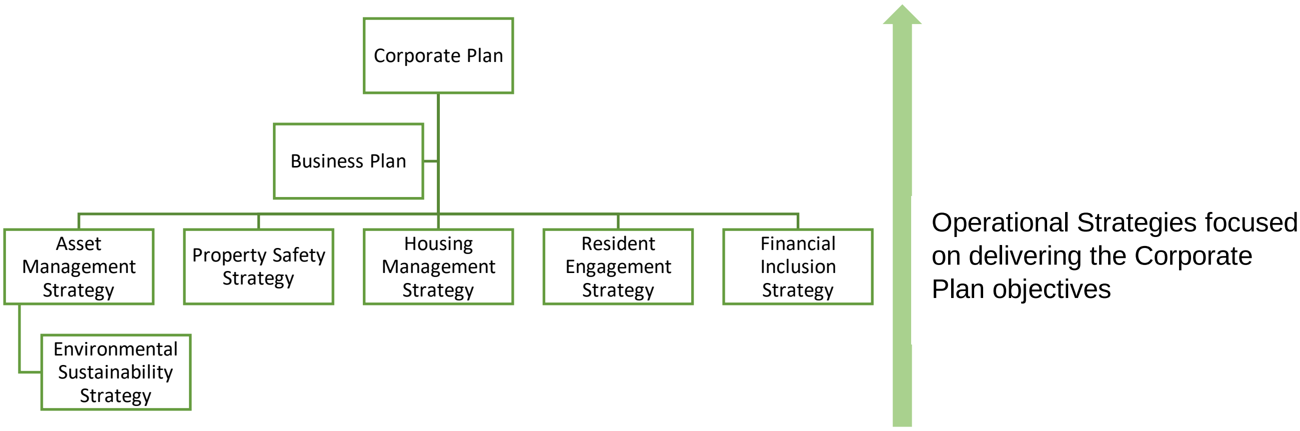
2. Context

2.1. Strategic Context

Corporate Plan 2023-2028

The operational strategies established by Hexagon seek to deliver the following organisational strategic objectives

- Good landlord Services that meet customer's needs
- Safe, decent, and efficient homes
- Residents are supported and making a positive difference



The Business Plan – sets the financial context and prioritises the financial resources to deliver the organisation's priorities.

This strategy has been set within the context of Hexagon's Business Plan 2023 to 2048. The strategy will be reviewed annually against its objectives and within the context of the updated business plan.

2.2. Key Service Objective for Property Safety

- Safe, decent, and efficient homes

<u>Outcome</u>

- We will ensure our homes are safe and well-maintained.
- We will take a risk-based and fabric first approach to building safety

2.3. Key strategic and operational risks

This strategy impact on three key strategic risks: -

1. SR1 - **Landlord Health and Safety**

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Serious Significant failures of Hexagon's legal and regulatory responsibilities to maintain safe homes

2. SR8 - **Counterparty/Contractor**

   Poor performance or failure of outsourced suppliers

3. SR3 - **Legal/regulatory compliance**

   Breaches of Hexagon's legal and regulatory requirements.

2.3.1. The strategy also impacts on the following operational risks: -

- PSOR1 Health and safety compliance
  Ensure legal compliance with activity in the following areas.
  - Asbestos
  - Electrical
  - Fire
  - Fire doors
  - Gas
  - Lifts
  - Water

- PSOR2 Building Safety Act compliance
  Meeting legal obligations set by the Building Safety Act; including the requirement to maintain a building safety case and engage in effective dialogue with residents of high-risk buildings on building safety matters.

- PSOR3 Regulatory compliance – Safety and Quality Standard section *“1.3 Health and Safety – 1.3.1 When acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas”*

- PSOR4 Manage contracts in line with the contract management framework
  More intensively manage higher value/higher risk contracts. Utilise defined agendas within the framework. Scrutinise performance against contractual indicators and develop joint action plans to address performance weaknesses and/or complaint trends. Deliver the social value commitments within the contract.

- PSOR5 Deliver the external wall remediation programme as set out.
  Ensure external wall remediation is delivered in line with the published programme. A 10-year programme designed to reduce risks within Hexagon’s 11m+ stock.

2.4. Regulatory and legal context

Hexagon's Property Safety Strategy supports the organisation's work in meeting the obligations of the: -

- Regulatory standard – Safety and Quality Standard
- Tenant Satisfaction Measures (relevant measures detailed below)

BS01	Gas safety checks
BS02	Fire safety checks
BS03	Asbestos safety checks
BS04	Water safety checks
BS05	Lift safety checks

2.4.1. Legislation including the: -

- Building Safety Act 2022
- Fire Safety Act 2021
- Smoke and Carbon Monoxide Alarm (England) Regulations 2015
- The Control of Asbestos Regulations 2012
- Control of Substances Hazardous to Health Regulations 2002
- Gas Safety (Installation and Use) Regulations 1998
- Lifting Operations and Lifting Equipment Regulations 1998
- Provision and Use of Work Equipment Regulations 1998
- The Electricity at Work Regulations 1989
- Health and Safety at Work etc. Act 1974

A comprehensive list of legislation and regulatory guidance is included within the relevant Property Safety Policy.

3. Objectives of the strategy

3.1. Strategic Objectives

	Compliance
	We will ensure that Hexagon complies with its legal requirements to: • Complete gas safety checks • Conduct electrical safety inspections • Undertake Fire Risk Assessments (FRA) and associated recommendations within appropriate timescales

	• Conduct asbestos surveys, encapsulating and removing materials where necessary • Service lifts and lifting equipment • Address legionella risk
	Efficiency
	• We will ensure that all areas of compliance are recorded on our core housing management systems. • We will maximise the use of system generated appointment reminders • We will automate information exchange with our key contractors • We will capture estate inspection records and update FRA accounts automatically
	Integrated into the business operations
	• We will continue to build upon procedures and IT workflows which ensure the organisation has given due consideration to property safety issues before embarking on building/repairs projects.
	Continuous improvement
	• We will strengthen our continuous improvement cycle • We will develop processes which ensure we capture learning and use it to enhance processes • We will adopt ISO9001 methodology/certification and utilise that structure to formally record learning and system development

3.2. Operational Objectives

	External wall remediation (11–18-meter buildings)
	We have developed a 3-step approach to addressing external wall remediation in our 11–18-metre buildings – aligned with our corporate objective of taking "a risk-based and fabric first approach to building safety." 1. We will undertake further investigative surveys to our buildings commencing with those with the highest remaining risk score and/or an active constructor 1.a We will undertake further Fire Risk Assessments relating to external walls completing these for wave 1 and those where a constructor is still active by end Q1 2024/25. 1.b We will request an external review of the outcomes – with recommendations on the next steps for the organisation. We will also seek legal advice to enable us to pursue the constructor for the cost of the remediation where they remain active. 2. We will remediate or mitigate based on risk – applying for government grant funding to support any remediation work programme where available and/or seeking compensation from the

	constructor. We have developed a ten-year programme of remediation commencing with wave 1 in 2024/25. 3. We will mitigate those which we are not able to be remediated in the first wave. Delivering the recommendations identified as a result of our Fire Risk Assessment programme and continuing to undertake our regular estate inspection programme.
	Fire Doors
	• We will ensure we continue to comply with the Fire Safety Order and regularly inspect and maintain our fire doors. • We will develop a system of QR codes where installation and inspection records can be easily accessed
	Building Safety
	• We will maintain live building safety records for our two highest risk buildings – annually updating their Building Safety Cases. • We will maintain a dialogue with residents of these buildings, in line with their agreed Resident Engagement Strategies. • We will publish the both the Fire Risk Assessments for the buildings and Building Safety Cases. • We will extend the arrangements in place for our highest risk buildings (building safety cases, resident engagement etc.) to our medium risk building.

4. Context for the strategy

Hexagon manage the following properties/blocks and safety related components

Flat Blocks	
High Rise (18+ meters)	2
Medium Rise (11-18 meters)	19
Supported Housing	
Directly Managed properties	163
Agency managed properties	76
Communal blocks requiring asbestos surveys	261
Blocks requiring Fire Risk Assessments	569
Electrical systems	
Individual dwellings	4428
Communal areas	329
Fire alarms	309
Fire boxes	32
Fire doors	560 doors – 21 flat blocks above 11 metres
Gas appliances including associated pipework	3667

Communal, disabled access lifts and hoists	129
Communal water systems (hygiene management)	50

5. Obligations for each property type

Health and safety compliance activity				
Compliance area	**Activity**	**Evidence**	**Frequency**	**Applicable to Property Type?**
Asbestos	Communal asbestos reviews	Asbestos reports	Annually	All communal areas of flat blocks and support housing
Electrical safety	Installation condition inspections (communal)	Electrical Installation Condition Reports (EICR)	Five Yearly	All communal areas
	Installation condition inspections(dwellings)	EICR	Five Yearly	All properties
Fire	Fire risk assessments	FRA report	Annually / every 2 or every 3 years As per Hexagon Fire Policy definitions	flat blocks with communal areas, supported housing
	Communal fire door inspections	Inspection record	Quarterly	11m+ flat blocks
	Individual flat fire doors	Inspection record	Annual	Flat blocks
	Fire alarm servicing and testing	Test records	Six monthly	Flat blocks, Supported Housing
	Dry risers	Test records	Annually	
	Fire extinguishers	Test records	Annually	
	Automatic opening vents	Test records	Six Monthly	
	Communal smoke detectors	Test record	Annual	Street properties
	Dwelling smoke detectors	Test records	Five yearly	All properties
	Lightning conductors	Inspection record	Every 11 months	11m+ flat blocks
Gas	Boiler/appliance servicing	LGSR	Annually	All properties with gas systems
	CO detectors	Test records	Annually	

Legionella (Water)	Legionella risk assessments	Risk assessment report	Bi- annually	Flat blocks with communal water systems
	Water tanks checks and testing	Test records	Six Monthly	
	Domestic sprinkler system	Test records	Annually	Flat blocks, supported housing
Lifts	Lift servicing	Test records	Annually	Flat blocks with a lift, properties with disabled adaptations
	LOLER	Insurance test record	Annually	Flat blocks with a lift

6. How we will achieve our vision

6.1. SWOT Analysis of property safety activity within Hexagon is included in appendix 1 of this strategy. The weaknesses, opportunities and threats identified within the SWOT Analysis have been used to develop the strategy action plan.

6.2. A full action plan is included in appendix 2 of this strategy. A summary of the plan is included below: -

Objective	Action	FY1	FY2	FY3
Compliance	Policy and procedure suite in place for all compliance areas + staff training completed.			
	Engage additional gas servicing support			
	Complete our internal asbestos action plan – linked to the asbestos audit			
	All water tanks / storage managed by Hexagon where possible has a programme of removal in place			
	No outstanding Fire Risk Assessment actions			
	Update the Hexagon website and include regular articles in Home News on asbestos			
Efficiency	Ensure all compliance activity is processed/monitored via our core housing management IT systems.			
	Automate the gas servicing process – highlighting activity in CX			
	Automate the electrical servicing process – highlighting activity in CX			
	Automate the publication of FRAs on the resident's portal.			
	Engage a centralised generic property/property safety consultancy to provide long term advice on property related matters			
Integrated into business operations	Review all Property Services Procedures to ensure that property safety related activity is integrated into processes			

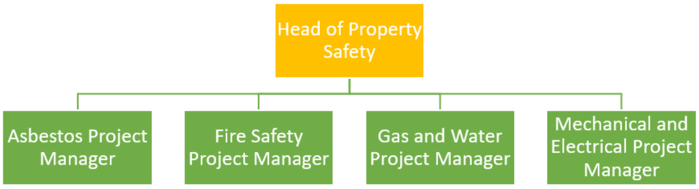
	Review the operations directorate's procurement processes to ensure that property safety considerations are fully understood before procurement activity is initiated			
Continuous improvement	Identify the requirements of ISO 9001- undertake self-assessment against the standard.			
	Complete the ISO 9001 Quality Manual and collate training records.			
External wall remediation	Establish the external wall issues associated with our medium rise properties.			
	Gain independent specialist advice on appropriate action following completion of an external wall fire risk assessment.			
	Deliver a programme of external wall remediation and risk mitigation for medium risk dwellings			
	Mitigate risk in our medium rise properties (11m +) during the term of the programme			
Fire Doors	QR codes on fire doors to enable surveyors and residents to review their installation and inspection history			
	Capture the outcome of estate inspections – evidencing fire door inspections			
Building Safety	Undertake an annual review of Building Safety Cases			
	Compile building safety information for all 11m + buildings			
	Develop live building safety reporting systems from the asset database			
	Put in place Fire Strategies for all 11m+ buildings – commencing with the two 18m+ buildings			
	Share Fire Risk Assessments with residents of all 11m + buildings.			
	Develop resident engagement strategies with all 11m + buildings.			

6.3. Metrics demonstrating the objectives of the strategy achieved. The team need to be consistently achieving 100% performance targets on: -

Compliance area	***Performance Indicator***
Asbestos	% of relevant blocks with valid asbestos survey
Carbon monoxide detection	% of properties with carbon monoxide detectors
Electrical safety certification	% of residential dwellings with valid electrical safety documentation
Fire door inspection	% of dwellings in blocks over 11 metres with in-date front entrance fire door inspection
Fire Risk Assessment completion within policy timescales	% properties with a valid fire risk assessment 0 overdue FRA actions

Gas safety certification	% of properties with a valid gas safety certificate
Heat/smoke detection	% properties with heat/smoke detectors
Lift servicing	% of lifts with an in-date servicing visit % of lifts with an in-date insurers inspection (LOLER)
Water systems risk assessment	% of relevant blocks with a valid water risk assessment

6.4. Resources are in place to deliver the strategy. A project manager is in place for each compliance area.



Budgetary resources have been identified within the Hexagon Business Plan to resource activity required to achieve 100% compliance. £800,000 has been set aside annually (with an inflationary uplift) to deliver the external wall remediation programme.

7. Other Strategic Links

7.1. Asset Management

The Property Safety Team are responsible for installing (where the need has been identified) and maintaining safety equipment.

This strategy does not address the replacement of equipment when it comes to the end of its useable life. Component replacement is detailed within Hexagon's Asset Management Strategy

7.2. Environmental Sustainability

A key objective of Hexagon's Procurement Procedure is to improve energy efficiency and combat climate change.

The Property Safety Strategy Hexagon will support this objective by: -

- Supporting the transition from gas heating systems to electrical systems (see Environmental Sustainability Strategy)
- Installing environmentally sustainable external wall insulation – ensuring that any products comply with British Standard *5250*
- Seeking to buy goods manufactured locally and employ local contractors limiting the carbon footprint of service delivery.
- Investing, utilising social value clauses within external contracts to deliver environmental improvements.

7.3. Community Wealth Building – Social Value

Hexagon has committed to "supporting social housing tenants to develop skills to enter and sustain employment and to develop digital skills." (Procurement Procedure)

Hexagon will ensure that contractors tendering for work to support the delivery of the Property Safety Strategy are required to demonstrate how they will deliver the above objective.

7.4. Service Delivery Models

Due to the specialist nature of the work contained within the Property Safety Strategy operational activity will be largely undertaken by external contractors.

Hexagon will project manage its contractors in line with its Contract Management Framework; engaging in more intensive management of the higher value and high-risk organisational contracts.

Audit arrangements have been put in place to ensure procedural compliance and quality checking of the contractor's activities (see Independent Audit of Compliance Areas Policy for details).

8. Appendix 1: SWOT Analysis

INTERNAL **STRENGTHS**	INTERNAL **WEAKNESSSES**
We have an effective compliance IT system – that reads certificates and updates our compliance position automatically.	*Performance in the compliance areas is not where we need it to be.*
We have in place a funded external wall remediation programme for medium rise properties.	*Staff turnover has been high – this has impacted on the organisation's ability to see through improvement plans*
We have qualified Project Managers in place for all compliance areas.	*The organisation as yet to fully leverage its strengths and maximise the use of IT to drive efficiencies and the effectiveness of service delivery.*
Our compliance policy and procedure suite is up to date.	
EXTERNAL **OPPORTUNITIES**	EXTERNAL **THREATS**
IT systems can be utilised further to drive efficiencies within the team. Specifically, this is around communication and data capture.	*External wall remediation is a challenge the organisation must address. An 11–18-meter plan has been approved. Additional work will be needed to understand the condition of the remainder of our stock and address external wall issues.*
Implementing a Building Information Management (BIM) system will improve the organisation's understanding of its assets and enable a Building Safety Case to be produced efficiently by the IT system.	*A number of compliance areas are reported as part of the Tenant Satisfaction Measure regime. Hexagon's performance on compliance will therefore be visible across the sector.*
Government grant funding, plus constructor funding is available to contribute to the 11–18-meter external wall remediation programme.	*A full understanding of the regulatory requirements under the new Safety and Quality Consumer Standard is yet to emerge. As expectations of the regulator develop this strategy will need to be reviewed to ensure it encompasses fully what is required of social landlords.*

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9. Appendix 2: Timeline

Objective: Compliance

We Will	How We Will achieve This	Measure	Date
Policy and procedure suite in place for all compliance areas + staff training completed	All policies are now in place (some remain in draft) All procedure documents will be completed by April 2024 Training will take place in April 2024	Completion of the Property Safety Action Plan ISO certification sought in 2024/25	end May 2024
Engage additional gas servicing support	We will procure additional gas servicing support. This will provide additional resilience should our main contractor be unable to respond.	100% gas servicing compliance	July 2024
Complete our internal asbestos action plan – linked to the asbestos audit	Complete the actions within the asbestos action plan and actions identified within the audit of the asbestos processes at Hexagon.	Performance data reported to Customer Services Committee and the Hexagon Board quarterly. Completion of audit actions reported to Directors Group and Audit and Risk Committee	September 2024
All water tanks / storage managed by Hexagon where possible has a programme of removal in place	Reduce the number of water tanks requiring legionella testing. Move toward water being mains fed where possible.	Performance data reported to Customer Services Committee and the Hexagon Board quarterly	Removal / risk mitigation Q4 24/25
No outstanding Fire Risk Assessment actions	Complete all overdue work	Performance data reported to Customer Services Committee and the Hexagon Board quarterly	end Q1 2024/25

Update the Hexagon website and include regular articles in Home News on asbestos	X2 articles annually	Articles in Home News and on the Hexagon website	Q4 2024/25

Objective: Efficiency

We Will	**How We Will achieve This**	**Measure**	**Date**
Ensure all compliance activity is processed/monitored via our core housing management IT systems.	All information contained on spreadsheets relating to property safety will be uploaded onto True Compliance Power BI will be used to report performance	Gas, water and lift information loaded onto True Compliance exclusively. TSM audit Data collection record sheet updated to reflect new practice	May 2024
Automate the gas servicing process – highlighting activity in CX	Work with colleagues in IT to build a gas servicing process in CX linking back to True Compliance	Gas Servicing compliance performance indicator	End Q4 2023/24
Automate the electrical servicing process – highlighting activity in CX	Work with colleagues in IT to build an electrical testing process in CX linking back to True Compliance	Electrical safety testing performance indicator	End Q1 2024/25
Automate the publication of FRAs on the resident's portal	Work with colleagues in IT to enable the resident's portal to be populated when a FRA is uploaded onto True Compliance	Report to Directors Group updating progress on the delivery of the objectives within the Property Safety Strategy	End Q2 2024/25
Engage a centralised generic property/property safety consultancy to provide long term advice on property related matters	Procure one generic specialist to advise on various topics. Put the contract in place for a minimum of 5 years to enable the consultancy to build up an understanding of Hexagon's stock	Report to Directors Group to approve the procurement exercise	March 2025

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Objective: Integrated into business operations

We Will	How We Will achieve This	Measure	Date
Review all Property Services Procedures to ensure that property safety related activity is integrated into processes	Priority order 1. Capital works procedure 2. Day-to-day repairs procedure 3. Planned works procedure	All procedures reviewed updated and approved.	End Q1 2024/25
Review the operations directorate's procurement processes to ensure that property safety considerations are fully understood before procurement activity is initiated	An agenda item on procurement will be added to the Asset Monitoring Group agenda. All new activity needs to be discussed and recorded by the meeting.	Orders on the P2P system will be monitored to ensure they are with only approved contractors	End Q2 2024/25

Objective: Continuous improvement

We Will	How We Will achieve This	Measure	Date
Identify the requirements of ISO 9001- undertake self-assessment against the standard	Purchase a copy of the British Standard Manual Undertake a self-assessment and undertake a gap analysis Develop an action plan to address weaknesses in current approach	External assessment against the requirements of ISO 9001.	Q4 2024/25
Complete the ISO 9001 Quality Manual and collate training records	Identify other similar organisations who have recently achieved ISO 9001 certifications. Develop a Hexagon Quality Manual building on the experiences of peer organisations.	Production of the ISO 9001 quality manual	December 2024
Undertake a formal assessment	Request a formal assessment of Hexagon's position against the requirements of ISO 9001	Accreditation or action plan to address identified weaknesses	February 2025 June 2025

		Seek reassessment if action plan required	

Objective: External wall remediation

We Will	How We Will achieve This	Measure	Date
Establish the external wall issues associated with our medium risk properties	Undertake Fire Risk Assessments External Wall in line with the programme in appendix 2	Delivery is outlined within appendix 2 and will be reported to the Governance and Viability Committee of the Hexagon Board	Timescales outlined within the delivery programme – see appendix 2
Gain independent specialist advice on appropriate action following completion of an external wall fire risk assessment.	Procure a specialist fire consultancy to recommend appropriate action following the external wall fire risk assessments	Review and recommendation will be undertaken in line with the programme set out in appendix 2	
Deliver a programme of external wall remediation and risk mitigation for medium risk dwellings	The programme is based on risk assessment and scoring and will be delivered over 10 years – see appendix 2	Deliver in line with programme contained within appendix 2	
Mitigate risk in our medium rise properties (11m +) during the term of the programme	Undertake annual Fire Risk Assessments and complete identified actions within the timescales contained within our Fire Safety Policy.	Performance data on Fire Risk Assessment recommendations reported to Customer Services Committee and the Hexagon Board	Performance data reported quarterly

Objective: Fire Doors

We Will	How We Will achieve This	Measure	Date
QR codes on fire doors to enable surveyors and residents to review	We will install QR codes on all fire doors to enable Hexagon staff and contractors to inspect fire doors.	Fire door inspection performance indicator	September 2024

their installation and inspection history	This will be expanded to residents once staff and contractors have tested the system.	Information contained on the resident's portal	
Capture the outcome of estate inspections – evidencing fire door inspections	Link the current IT system to fire door inspection records	Performance indicator on fire door inspections	Populated from March 2024

Objective: Building Safety

We Will	How We Will achieve This	Measure	Date
Undertake an annual review of Building Safety Cases	Present to Audit and Risk Committee annually	Committee Report	May annually
Compile building safety information for all 11m + buildings	18m+ buildings compiled Wave 1 compiled by March 2025	 Growth and Viability Committee report	December 2023 March 2025
Develop live building safety reporting systems from the asset database	Implement a Building Information Management IT system Link the system to live repairs data to ensure all related activity is captured	Monthly Leadership Team reports on progress	Complete by September 2024
Put in place Fire Strategies for all 11m+ buildings – commencing with the two 18m+ buildings	Develop a fire strategy template for publishing on display boards. Complete the documents for Parkspring and Patrick Court following meetings with residents Put in place documents for all other remaining 11-18m buildings	121 meetings and appraisal objective	December 2024

Share Fire Risk Assessments with residents of all 11m + buildings.	Upload FRAs onto the leaseholder portal – commencing with Parkspring and Patrick Court in March 2024	Documentation uploaded on to portal	March 2024 July 2024
Develop resident engagement strategies with all 11m + buildings	Engagement strategies in place for wave 1 by March 2025	Report to Customer Services Committee on progress	March 2025