

Appendix 2 – Roadmap and Action Plan

- 1.1. Recommendations made throughout the Safety and Quality Standard Review and Compliance Health Check report are summarised within the action plans below. Implementing these recommendations will provide full assurance across all areas of compliance and will ensure Thurrock Borough Council (TBC) has the necessary arrangements in place to effectively manage compliance with the Safety and Quality Standard within 12 months. We can assist you with delivering all elements of the roadmap if required.
- 1.2. We have made a total of 24 recommendations. Please note priorities and timescales are for guidance only, but represent our views on how quickly you should address the issues:
- 1 x critical – begin immediately.
 - 12 x high – begin within one month.
 - 8 x medium – begin within three months.
 - 1 x low – begin within six months.

Safety and Quality Standard Compliance Roadmap – Recommendations		
Report ref.	Recommendation	Priority
S&Q 2.2	<p>Recommendation 1 – Compliance Strategy:</p> <p>Develop a Compliance Strategy, ensuring it:</p> <ol style="list-style-type: none"> 1. Covers the ‘big six’ areas of compliance. 2. Incorporates the three lines of defence assurance framework to ensure that each line of defence has been considered for a robust approach. 3. Incorporates management actions that detail the specific tasks required to achieve your priorities (for example, the actions arising from this review), supported by an action plan with action owners and target dates. 4. Sets out your overall objectives and ensures you are clear on: <ul style="list-style-type: none"> • Legal and regulatory obligations, now and in the future. • Your overall objectives for regulatory compliance and resident safety. • How you will demonstrate that these actions are deliverable 	High
S&Q 2.2	Recommendation 2 – Reporting to elected members and committees:	High

Safety and Quality Standard Compliance Roadmap – Recommendations

Report ref.	Recommendation	Priority
	Develop formal regular reporting cycles to your portfolio holder, member-led compliance group and Place Oversight and Scrutiny Committee to increase oversight of your compliance with legal and regulatory requirements and strengthen your second line of defence.	
S&Q 2.2	<p>Recommendation 3 – Compliance and Regulatory Standards Awareness training:</p> <p>It is recommended that the Board implement periodic formal governance and compliance training to support members in effectively scrutinising performance data, understanding regulatory obligations, and fulfilling their oversight responsibilities. This would further strengthen informed decision-making and overall governance effectiveness.</p>	Medium
S&Q 2.3	<p>Recommendation 4 - Data validation:</p> <ol style="list-style-type: none"> 1. Undertake a data validation exercise that is coordinated across all compliance areas to gain assurance around all property assets, compliance programmes, and records. This exercise is best completed by an independent third party (internal or external) to ensure a robust methodology is used and appropriate challenge is given. 2. Following this exercise, establish a formal, regular, and documented reconciliation process to ensure asset and compliance data remains accurate and up to date. 3. Introduce compliance data reviews across all areas and provide staff training on accurate, auditable record keeping. 	Critical
S&Q 2.3	<p>Recommendation 5 - Establish a single source of truth:</p> <ol style="list-style-type: none"> 1. Explore the capabilities of your AMS, Northgate NEC, to centralise compliance, repairs, and contract data with the system. 2. Where capabilities of the system do not meet requirements of the organisation, consider the procurement of other suitable compliance management software to eliminate spreadsheets and prevent duplication or errors. 3. Explore the use of a shared data environment to ensure both you and contractors are working from a single, up to date dataset. 4. Ensure records are updated promptly by the administration team, supported by automated transfers and monitoring to identify and fix delays. 	High

Safety and Quality Standard Compliance Roadmap – Recommendations

Report ref.	Recommendation	Priority
	<ol style="list-style-type: none"> 5. Implement a process for tracking and monitoring the follow-up actions deriving from your compliance programmes. Each action should be documented, and you should be able to evidence that the action has been completed. 6. Ensure that data transfer protocols are specified as part of any new contract awards. 7. Complete your planned programme of stock condition surveys, using HHSRS methodology and use this to update component information within your asset management system. 	
S&Q 2.3.	<p>Recommendation 6 - Centralised asbestos register within the AMS:</p> <p>Develop and maintain a centrally managed asbestos register within the AMS. The register should consolidate all asbestos related information, including survey findings, identified asbestos containing materials (ACMs), access limitations, and review dates, and be kept accurate and up to date.</p>	High
S&Q 2.3	<p>Recommendation 7 – Exporting data from contractor systems:</p> <ol style="list-style-type: none"> 1. Explore how data can be exported from contractor systems to NEC to ensure you have full access to and control of your data. 2. Explore whether a data management system can be implemented (such as a secure shared platform or integrated into NEC) to enable TBC and contractors to access compliance programme information in real time. 	High
S&Q 2.4	<p>Recommendation 8 - Performance reporting:</p> <ol style="list-style-type: none"> 1. Update compliance reporting at all levels to address the suggestions and metrics contained within Section 2.4.6 and 2.4.7 so that data provided in the reports clearly demonstrates assurance. This will allow elected members and leaders to identify the level of non-compliance so appropriate action can be agreed and taken (see Appendix 3 for example compliance scorecards). 2. Add reporting against Awaab’s Law to your performance metrics, using the metrics outlined in 2.4.9. 3. Develop your approach to horizon scanning to include how you will respond to emerging issues. 	Medium

Safety and Quality Standard Compliance Roadmap – Recommendations

Report ref.	Recommendation	Priority
S&Q 2.5	<p>Recommendation 9 - Policy framework and policy review:</p> <ol style="list-style-type: none"> 1. Develop your policy framework so that you have a register and library of policies, agreed approval and consultation routes and a consistent approach to policy development. 2. Policies should be approved by the Leadership Team/Cabinet through a formal approval process and reviewed formally every two years thereafter (or sooner if there is a change in applicable legislation or guidance). 3. Undertake policy principles and strategic direction workshop when reviewing and refreshing policies so that leaders and stakeholders can agree the strategic decisions for each compliance area. 4. Following the workshop, develop a new suite of policies to contain the information set out in paragraph 2. 5.6. 5. Once your policies have been developed, develop a suite of process maps and procedures for each area. 6. Process maps should provide a high-level overview of delivery and show those responsible for each stage. 7. Procedures should provide detailed written narratives to support each of the policies and process maps. 	Medium
S&Q 2.6	<p>Recommendation 10 – Training:</p> <ol style="list-style-type: none"> 1. Update the training matrix to include review and renewal dates for all applicable training courses. This will support more effective monitoring of training validity, help identify upcoming refresher requirements in a timely manner, and strengthen assurance that staff competencies remain current in line with statutory and organisational requirements. 2. Develop a training matrix for all staff with Safety and Quality Standard responsibility or support staff with roles relating to the standard such as call centre staff, estate managers, and so on. This will identify gaps and ensure training and competence is kept up to date. Any gaps should be addressed by undertaking appropriate qualifications within appropriate timeframes. 3. Teams should undertake regular regulatory standards and compliance refresher training to stay up to date with the latest legal obligations. 4. Review the requirements of the Competence and Conduct Standard and undertake an exercise to identify staff who fall in scope of this and the qualifications they hold. Use this to develop a resource project plan to meet the requirements of the standard from October 2026 onwards. 	Low

Safety and Quality Standard Compliance Roadmap – Recommendations

Report ref.	Recommendation	Priority
S&Q 2.8	<p>Recommendation 11 – Resident communications:</p> <ol style="list-style-type: none"> 1. Develop a structured resident engagement strategy on property safety and compliance. 2. Provide regular, targeted communications and awareness campaigns, improve access to policies on the website, and align initiatives with national campaigns like Gas Safety Week and Fire Safety Week. 3. Be mindful of any diverse needs and requirements under the Transparency, Influence and Accountability standard when communicating with tenants and consider wider accessibility measures beyond language barriers, such as sensory impairments or neurodiversity when planning communications. 4. Ensure that your policies are readily available and published on your website for greater transparency and accountability. 	Medium
S&Q 2.9	<p>Recommendation 12 – Compliance assurance and audit framework:</p> <ol style="list-style-type: none"> 1. Create a compliance assurance framework combining internal audits, desktop record checks, and independent third-party reviews. 2. Implement full desktop checks to verify records and follow up actions and use accredited third-party auditors for sample field and record reviews to provide independent assurance across all areas. 3. Undertake your internal audit process at least every two years, in line with industry best practice and develop the approach to ensure you cover areas such as stock condition. Ensure you follow up on any recommendations. 4. Your internal auditor should have the required levels of competence and knowledge of legal, regulatory, and best practice compliance obligations to provide a meaningful assurance report with appropriate assurance ratings. 	High
S&Q 2.10	<p>Recommendation 13 – Consistency and resourcing of block and estate checks:</p> <ol style="list-style-type: none"> 1. Ensure roles and responsibilities are tightly defined as part of the new structure. 2. Ensure ways of working are documented in procedures, process maps along with a training and communication plan. 3. Introduce sample checks on log sheets and actions to ensure compliance with the new approach. 	High

Safety and Quality Standard Compliance Roadmap – Recommendations

Report ref.	Recommendation	Priority
S&Q 2.11	<p>Recommendation 14 – Review of Consumer Standards self-assessment:</p> <ol style="list-style-type: none"> 1. Review your most self-assessment and complete areas where there are gaps. Expand the narrative to how what you are saying shows you meet or do not meet the standard. 2. Add additional details where further work is needed, detailing what this is and with milestones and accountabilities for completion. 3. Add a section to record your evidence sources that show how you are meeting the standard. 	Medium
S&Q 3.1	<p>Recommendation 15- Stock Condition:</p> <ol style="list-style-type: none"> 1. Implement your stock condition programme to ensure you hold up-to-date information on 100% of your stock. 2. Ensure data is checked and validated once surveys are received and before being uploaded to systems. Develop a procedure to document your approach to this. 3. Use a range of other data sources in addition to SCS data to build upon your knowledge of homes, including your wellbeing checks and programmes such as gas safety checks. 4. Develop a dashboard as your property data grows, bringing in data from range of sources and including vulnerabilities to build a more holistic view of your properties. 	High
S&Q 3.2	<p>Recommendation 16 – Decency:</p> <ol style="list-style-type: none"> 1. Implement your stock condition programme to ensure you hold up-to-date information on 100% of your stock and can report accurately on your DHS position and use this data to update your systems. 2. Ensure elected members and leaders are sighted on Category 1 hazards and DHS failures as part of regular formal reporting. 	High
S&Q 3.3	<p>Recommendation 17 – Property Compliance</p> <ol style="list-style-type: none"> 1. Implement the recommendations made at Section 2 of this report. 2. Implement the recommendations made through the Compliance Health Check. 	High

Safety and Quality Standard Compliance Roadmap – Recommendations

Report ref.	Recommendation	Priority
S&Q 3.3	<p>Recommendation 18 – Repairs and Maintenance</p> <ol style="list-style-type: none"> 1. Review what your TSM data is telling you about management of communal areas and triangulate this with other data sources such as complaints, ASB, estate inspection data and so on to plan improvements. 2. Ensure that reports on repairs performance, including issues of damp and mould go to both operational management groups and to elected members and leaders. 3. Establish robust contract management arrangements and mobilisation plans in the event a new repairs contractor is appointed. 	Medium

Compliance Health Check – Subject specific recommendations

Report ref.	Recommendation	Priority
CHC 3.1	<p>Recommendation 19 - Ensure accessible display of landlord’s gas safety records (LGSRs) for communal boilers: Display LGSRs for communal boilers in locations accessible to all affected residents to meet Gas Safety Regulations 1998 and improve transparency on gas safety.</p>	High
CHC 3.1.7	<p>Recommendation 20 – Strengthening control of the gas servicing programme:</p> <ol style="list-style-type: none"> 1. Strengthen oversight and control of the gas servicing programme by ensuring that programme data is centrally managed and owned by TBC. 2. Implement a shared, real time data management solution (for example, a secure shared platform, or via a contractor portal with direct integration to the AMS) to enable both TBC and its contractors to access and update programme information consistently. 3. Establish a single source of accurate, up to date data to improve visibility of servicing status and appointments, reduce reliance on emailed spreadsheets, and support more effective monitoring, assurance, and delivery of statutory gas safety obligations. 	High

Compliance Health Check – Subject specific recommendations

Report ref.	Recommendation	Priority
CHC 3.2.4	<p>Recommendation 21 – Targeting properties with EICRs older than five years: Prioritise gaining access to properties which are still outside the five-year cycle by May 2026.</p>	Medium
CHC 3.3.7	<p>Recommendation 22– Timely receipt and management of FRA actions: Strengthen controls around the receipt and management of Fire Risk Assessment (FRA) reports to ensure timely visibility of all identified actions.</p> <p>This should include either the implementation of robust service level agreements with contractors specifying clear timescales for the submission of FRA reports, or the adjustment of internal remedial action timescales to commence from the date the FRA report is received.</p>	Medium
CHC 3.4.6	<p>Recommendation 23 – Recording and management of domestic asbestos surveys: Implement a formal and consistent process for recording all asbestos management surveys undertaken in domestic properties. This should include capturing survey dates, locations, access limitations, and details of any identified asbestos containing materials (ACMs) within a centrally managed system.</p> <p>Establish a structured recording process to ensure survey findings are retained, accessible, and used effectively, reducing duplication of effort and supporting a more efficient and auditable approach to domestic asbestos management.</p>	Medium
3.4.6	<p>Recommendation 24 – Improving resident communications of asbestos risks: Develop a clear and proportionate approach to sharing asbestos related information with residents, including providing property specific information on the location of known or presumed ACMs within their homes where appropriate.</p> <p>Improved resident communication will support tenant awareness, reduce the risk of accidental disturbance, and help ensure residents understand the actions to take should asbestos be damaged or exposed</p>	Medium

Appendix 3 – Example scorecards

Tenant Satisfaction Measures - Compliance Safety Checks										Reporting date: April 2023		
Domestic Properties:	10,000	Asset summary			Performance					Trend analysis	Outstanding follow on works	
		Communal Blocks:	100	Total properties	Not on programme	On programme	Compliance	Non-compliance	Due within 30 days			Dwellings at risk
Commercial:	50											
Gas Safety Checks	BS01	Communal blocks	100	50	50	48	2	5	25	94.40%	→	0
		Properties with a communal boiler			50	48	2	5	25			
		- Dwellings served by a communal boiler			400	375	25					
		Domestic dwellings	10000	1000	9000							
Fire Safety Checks	BS02	Communal blocks	100	80	20	19	1	30	27	94.00%	↓	20
		Properties requiring an FRA			20	19	1	30	27			
		- Owned dwellings within the properties			400	375	25					
		- Dwellings managed by a 3rd party			50	48	2					
Asbestos Safety Checks	BS03	Communal blocks	100	85	15	15	0	0	1	99.67%	↑	100
		Properties requiring an asbestos survey			15	15	0	0	1			
		- Owned dwellings within the properties			250	250	0					
		- Dwellings managed by a 3rd party			50	49	1					
Water Safety Checks	BS04	Communal blocks	100	85	15	14	1	50	4	98.00%	↑	75
		Properties requiring an LRA			15	14	1	50	4			
		- Owned dwellings within the properties			200	198	2					
		- Dwellings managed by a 3rd party			50	48	2					
Lift Safety Checks	BS05	Communal blocks (passenger lifts only)	100	90	10	10	0	30	15	92.50%	↓	50
		Properties requiring a LOLER inspection survey			10	10	0	30	15			
		- Owned dwellings within the properties			150	145	5					
		- Dwellings managed by a 3rd party			50	40	10					
Electrical Safety Checks	INT06	Communal blocks	100	50	50	45	5	250	25	93.87%	→	0
		Properties with a communal supply			50	45	5	250	25			
		- Dwellings served by a communal supply			400	375	25					
		Domestic dwellings	10000	1000	9000							
Commercial properties	INT03	Commercial properties	50	5	45	48	0	10	0	100.00%	↑	10
		Properties requiring an FRA			48	48	0	10	0			
		Commercial blocks	100	85	15	15	0	0	1			
		Properties requiring an asbestos survey			15	15	0	0	1			
Commercial properties	INT04	Commercial properties	50	10	40	40	0	0	0	100.00%	↑	0
		Properties requiring an LRA			40	40	0	0	0			
		Domestic dwellings	10000	9850	150	146	4	100	4			
		Total dwellings requiring an LRA			150	146	4	100	4			
Commercial properties	INT05	Commercial properties	50	35	15	15	13	2	2	86.67%	→	0
		Properties requiring a LOLER inspection survey			15	15	13	2	2			
		Domestic dwellings	10000	1000	9000	8449	551	500	151			
		Total dwellings requiring an electrical test			9000	8449	551	500	151			
Commercial properties	INT06	Commercial properties	50	50	50	50	50	0	0	100.00%	→	0
		Properties requiring a electrical test			50	50	50	0	0			
		- Dwellings served by their own individual supply			8550	8400	150					
		- Dwellings managed by a 3rd party			50	49	1					

Trend Analysis Key:



Performance has improved since last reporting period






Performance remains unchanged since last reporting period



Properties have become non-compliant since last reporting period

12 Month Trend Analysis - TSM Compliance Percentage (%)



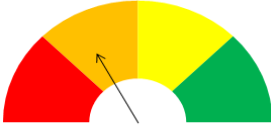

		Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24
Gas Safety Checks	BS01	94.40%											
	INT01	100.00%											
Fire Safety Checks	BS02	94.00%											
	INT02	100.00%											
Asbestos Safety Checks	BS03	99.67%											
	INT03	88.89%											
Water Safety Checks	BS04	98.00%											
	INT04	100.00%											
Lift Safety Checks	BS05	92.50%											
	INT05	86.67%											
Electrical Safety Checks	INT06	93.87%											
		100.00%											

Trend Analysis Key:		Performance has improved since last reporting period		Performance remains unchanged since last reporting period		Properties have become non-compliant since last reporting period
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Month to month stock variations

Breakdown of property type	Monthly summary			Breakdown of movements		
	Mar-23	Apr-23	Month to month variation	Acquisition	Disposal	Change of property type
Total number of domestic dwellings	9,000	9,000	0			
Total number of communal blocks	198	200	(+2)	(+2)		
Total number of commercial properties	50	50	0			

Appendix 4 – Assurance Rating Criteria

Assurance level	Design of internal control framework	Operational effectiveness of internal controls
 <p>Substantial Assurance</p>	<p>There is a robust system of internal control designed to achieve system objectives. Appropriate procedures are in place to mitigate key risks and fully comply with applicable legislation. There are several areas of best practice.</p>	<p>The controls in place are applied consistently and there are no, or only low, priority weaknesses noted.</p>
 <p>Reasonable Assurance</p>	<p>There is a reasonable system of internal control designed to achieve system objectives with some exceptions. Generally, appropriate procedures are in place to mitigate key risks and comply with applicable legislation, although some are not fully effective.</p>	<p>The controls are applied in most instances; however, some non-compliance was identified through testing. Weaknesses are primarily of a medium or low priority.</p>
 <p>Limited assurance</p>	<p>There are significant gaps in the system of internal control, with system objectives at risk of not being achieved. There are several weaknesses identified in the procedures in place to mitigate key risks and comply with applicable legislation.</p>	<p>There is evidence of non-compliance, and several reoccurring weaknesses identified through testing. Weaknesses are primarily of a medium priority.</p>
 <p>No assurance</p>	<p>The system of internal control is not fit for purpose and a significant likelihood that the system's objectives will not be achieved. There are several procedural gaps which do not mitigate key risks or facilitate compliance with applicable legislation.</p>	<p>There is evidence of consistent or frequent non-compliance. Due to the absence of effective procedures, several reoccurring weaknesses have been identified through testing. Weaknesses are primarily of a high priority.</p>
Recommendation priorities		
Three (low)	Areas that individually have no significant impact, but where the organisation would benefit from improved controls to achieve greater effectiveness and efficiency.	
Two (medium)	A weakness where there is a moderate risk of legal or regulatory non-compliance, poor value for money, or failure to achieve operational objectives. Remedial action should be taken as soon as practicable.	
One (high)	A weakness where there is substantial risk of legal or regulatory non-compliance, poor value for money, or failure to achieve operational objectives. Remedial action should be taken urgently.	