

Follow Up Audit Objective

To provide assurance that management has implemented agreed actions to mitigate the risk exposures found in the 2023/24 Housing Electrical Safety audit.

| Follow Up Progress Summary | | | | | |
|----------------------------|----------|-------------|-------------|------------|----------|
| Priority | Complete | In Progress | Not Started | Superseded | Summary |
| Priority 1 | 2 | 0 | 0 | 0 | 2 |
| Priority 2 | 1 | 1 | 0 | 1 | 3 |
| Priority 3 | 3 | 1 | 0 | 0 | 4 |
| Total | 6 | 2 | 0 | 1 | 9 |

Follow Up Assessment

We conducted a Housing Electrical Safety audit in 2023/24 to assess the risk that an incomplete programme of electrical safety inspections and repairs work could lead to health and safety risks for tenants and financial and reputational damage to the council. We found nine weaknesses and provided Limited assurance.

In this follow up review, we have found that the council has completed six of the nine agreed actions. One further action has been superseded. Our key findings are summarised below.

Key Findings



Since the original audit, the council has:

- Procured a bolt-on system, TCW Compliance, which will automate current manual processes including data input, and will store information previously kept in separate spreadsheets.
- Decided to remediate issues that external consultants previously downgraded from Category 2 to Category 3.
- Significantly reduced the number of outstanding remedial actions across the housing stock.
- Uploaded important monitoring spreadsheets to SharePoint and confirmed that the SQL database can recall historic records.
- Addressed gaps in the Electrical Safety Policy for Housing.
- Uploaded the Electrical Safety Policy for Housing to the council website.



Further action is needed to:

- Introduce performance indicators that monitor the overall number of EICR Satisfactory and Unsatisfactory properties, and compliance with the 28-day target for remedial works.



Officers assessed one action as being superseded:

- Officers told us the recommendation to implement quarterly sample checks on electrical safety information is superseded by introducing TCW, which will automate data input by scanning and inputting information included in inspection certificates. However, during this review our sample testing and analysis found some inconsistencies between current monitoring spreadsheets and One Housing. Officers have now started reviewing these inconsistencies.

Further Information

We have performed testing and reviewed supporting evidence to confirm the council's progress in implementing all priority 1 and 2 actions. Our assessment of the priority 3 actions is based on self-assessment by the responsible officer.

Please refer to Appendix 1 for our detailed findings.

Appendix 1

Agreed Actions & Follow Up Assessment

| Issue and Agreed Action | Follow Up Assessment | Complete |
|---|---|----------|
| <p>Issue: The council records electrical safety compliance information and evidence in three places, meaning there is no one complete electrical safety compliance record.</p> <p>Agreed Action: We are now investigating buying an additional module that will facilitate this. There is a workaround in place at the moment which is allowing the service to function.</p> <p>All data will be stored on the document management system and spreadsheets being used to monitor compliance while Housing completes this work.</p> <p>Priority 1 <i>SWAP Ref: AP#4337</i></p> | <p>The Housing service has acquired the TCW Compliance bolt-on system and plans to start implementing the system in January 2026.</p> <p>This new system will automate processes that are currently handled manually and will gather and store information previously kept in separate spreadsheets. Officers anticipate that it will take between three to six months to fully implement the system. Inspection certificates will be stored in SharePoint.</p> <p>The agreed action has been completed.</p> | |
| <p>Issue: There are discrepancies between the compliance figures prepared by a Compliance officer and the reported performance figures.</p> <p>Agreed Action: The Director of Housing and Health will consider these findings and determine what action is needed to address them. The downgrades may present a risk to the council, though SWAP cannot assess how likely it is that the risk would materialise.</p> <p>Priority 1 <i>SWAP Ref: AP#4473</i></p> | <p>The Housing service has taken a proactive approach by treating downgraded installations as Category 2 issues and incorporating them into the wider remediation programme. The number of homes with Unsatisfactory EICR ratings across the whole stock has reduced from 893 in August 2024 to 220 currently. The remaining remedials will be completed as part of the new electrical contract commencing April 2026.</p> <p>Given that a clear approach has been established and substantial progress achieved, we consider this action complete.</p> | |

| Issue and Agreed Action | | | Follow Up Assessment | | In Progress | |
|--|---|-------------------|---|--------------------|-------------|---------------|
| <p>Issue: The council does not monitor how quickly its contractors complete electrical remedial works.</p> <p>Agreed Action: The Director of Housing and Health will adopt the 28-day remedial works target as a performance metric, both for the council itself and for its contractors.</p> <p>The council is now monitoring the time between raising orders and completing works.</p> | | | <p>The Housing service introduced a method for monitoring compliance with the 28-day remedial works target via the EICR Tracker spreadsheet. However, the recommended KPI has not yet been implemented. Quarterly reports to the Housing Review Board monitor the number of outstanding remedial actions but classify them as either less than or more than three months old, rather than using the 28-day target.</p> <p>Since the original audit, the Housing service has set a clear expectation that contractors must remediate Category 1 and Category 2 issues before leaving the site. Our review of properties inspected in 2025 found only two of 252 properties had outstanding Category 2 actions. The overall number of outstanding remedials has reduced significantly over the past year (from 893 in August 2024 to 220 at the time of writing).</p> <p>As noted under AP#4337, the Housing service has procured TCW Compliance and expects to implement it from January 2026. Officers advised that TCW will record details of all individual faults identified during inspections and enable monitoring of the time taken to remediate each fault.</p> <p>Officers interviewed during this follow-up audit agreed that the recommended KPI should be implemented. We have therefore assessed the action as in progress. However, given the substantial improvements in managing remedials, we have downgraded this action from Priority 1 to Priority 2.</p> | | | |
| Priority | 2 | SWAP Ref: AP#4329 | Responsible Officer | Compliance Manager | Timescale | 30 April 2026 |
| Issue and Agreed Action | | | Follow Up Assessment | | Superseded | |
| <p>Issue: There is no quality assurance of electrical safety compliance information recorded in One Housing or the compliance spreadsheet.</p> <p>Agreed Action: The Director of Housing and Health has now introduced spot checks on compliance records.</p> | | | <p>We reviewed records for a sample of ten properties to confirm if key information had been recorded accurately and consistently across the EICR Tracker, master programme spreadsheet and One Housing. We found that three properties had inconsistent recording, or that recorded information did not match to the latest available EICR certificate.</p> <p>We then compared the dates for the last and next inspection for all properties recorded in the master programme spreadsheet to One Housing. We found that 1.6% of last inspection and 7.8% of next inspection dates did not match. Officers have started reviewing these inconsistencies.</p> <p>Officers told us that the agreed action to introduce quarterly sample audits will be superseded by the forthcoming implementation of the TCW Compliance system, which will automate data input and compliance checks, eliminating the need for manual sample auditing. Officers will input EICR certificates received in the last five years to ensure TCW is fully populated.</p> | | | |
| Priority | 2 | SWAP Ref: AP#4338 | | | | |

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|---|----------|---|----------------------------|--------------------|--------------------------------|
| Issue and Agreed Action | | Follow Up Assessment | | Complete | |
| <p>Issue: The Housing service does not keep evidence confirming reported KPI figures.</p> <p>Agreed Action: The Housing service will keep evidence used to prepare performance reports. Work on a KPI dashboard has already started.</p> | | <p>Housing officers confirmed that the EICR Tracker and master programme spreadsheets are now stored on SharePoint, allowing historic versions to be retrieved if required. Officers also demonstrated that the SQL dashboard can recall historic KPI figures and generate supporting data. We therefore consider this action complete.</p> | | | |
| Priority | 2 | <i>SWAP Ref: AP#4474</i> | | | |
| Issue and Agreed Action | | Follow Up Assessment | | In Progress | |
| <p>Issue: The council does not include the number of properties with unsatisfactory inspection outcomes in its performance reports.</p> <p>Agreed Actions: The Director of Housing and Health will introduce a KPI metric monitoring the number of homes with an unsatisfactory EICR report. Work on a KPI dashboard has already started.</p> | | <p>The Housing service has not implemented this action. While this information is collected, it is not integrated into performance dashboards or Housing Review Board reports.</p> <p>Officers interviewed during this follow-up audit agreed that the recommended KPI should be implemented. We have therefore assessed the action as in progress.</p> | | | |
| Priority | 3 | <i>SWAP Ref: AP#4475</i> | Responsible Officer | Compliance Manager | Timescale 30 April 2026 |
| Issue and Agreed Action | | Follow Up Assessment | | Complete | |
| <p>Issue: There are gaps in the Electrical Safety Policy for Housing.</p> <p>Agreed Action: The Director of Housing and Health will update the Electrical Safety Policy for Housing to include the missing information. The Director of Housing and Health will also ensure that all relevant staff are briefed on the updated Policy.</p> | | <p>Housing officers confirmed they have updated the Electrical Safety Policy for Housing to address the gaps found in the original audit. The Executive Leadership Team approved the updated policy in March 2025.</p> | | | |
| Priority | 3 | <i>SWAP Ref: AP#4315</i> | | | |
| Issue and Agreed Action | | Follow Up Assessment | | Complete | |
| <p>Issue: The Electrical Safety Policy for Housing (ESPH) has not been uploaded to the council's website.</p> <p>Agreed Action: The Director of Housing and Health will ensure the Electrical Safety Policy is uploaded to the website.</p> | | <p>Housing has uploaded the November 2023 version of the Electrical Safety Policy for Housing to the council website.</p> <p>The March 2025 version of the Policy has not yet been uploaded due to a wider review of the council website.</p> | | | |
| Priority | 3 | <i>SWAP Ref: AP#4316</i> | | | |

| Issue and Agreed Action | Follow Up Assessment | Complete |
|---|--|--------------------------|
| <p>Issue: Housing did not maintain the Regulator of Social Housing (RSH) action plan, though significant actions were outstanding.</p> <p>Agreed Action: The Housing service will formally monitor the progress of any significant outstanding actions from the Regulator of Social Housing action plan until they are completed.</p> | <p>Housing officers reported that they have consolidated all outstanding action plans into a master document held by the Housing Projects team. The outstanding actions from the RSH action plan have been included in this master document. The council has now appointed an external quality surveyor to monitor the work of the main electrical works contractor, as required by the original action plan. The Compliance team has also introduced site audits to assess work completed by the electrical works contractor.</p> | |
| <p>Priority</p> | <p>3</p> | <p>SWAP Ref: AP#4515</p> |