

Appendix C

Corporate Landlords Service

Management and Compliance Summary Report – Education 2021-2022

Audit Summary

Corporate Landlords Services are undertaking Management and Compliance Checks and actively monitoring business operations within our asset and every premises within the Local Authority’s asset portfolio will be subject to a Management and Compliance Check.

During July 2021, the compliance officers commenced a schedule of compliance checks within secondary schools. Given the pressures on the service areas and staff, the checks were completed through site visits and a supportive and empathetic approach was applied, offering a high-level of flexibility.

The Management and Compliance process examines 14 key areas and these are as follows:

➤ Fire Safety Order 2005	➤ Lifting Equipment: LOLER 98 & Pressure Vessels Thorough examinations	➤ Workplace transport – Road Traffic Act
➤ Asbestos Control		➤ Traffic Management
➤ Electricity at Work Regulations	➤ Local Exhausts Ventilation Systems - COSHH	➤ Outdoor equipment and Provisions
➤ Gas Safety and Installation and Use regulations	➤ Commercial Kitchens	➤ Security Systems and arrangements
➤ Legionella	➤ Glazing – regulation 14/ EN12600	➤ Smoke Free legislation

Due to some levels of non-compliance with the formal submission and management of 3rd party lettings and the landlords consent process, the scope of the compliance check was extended in September to include these critical areas.

The Management and Compliance Checks for secondary education including PRU’s and Special schools have now been completed and the schedule of dates and overall compliance rating have been highlighted in Appendix 1. To ensure that the premises were assessed based on risk, these were RAG rated to offer a prioritised work stream, with STF and PRU’S being prioritised with support. However, due to significant challenges around COVID and maintaining education operation, these dates changed following a request by the schools.

Findings

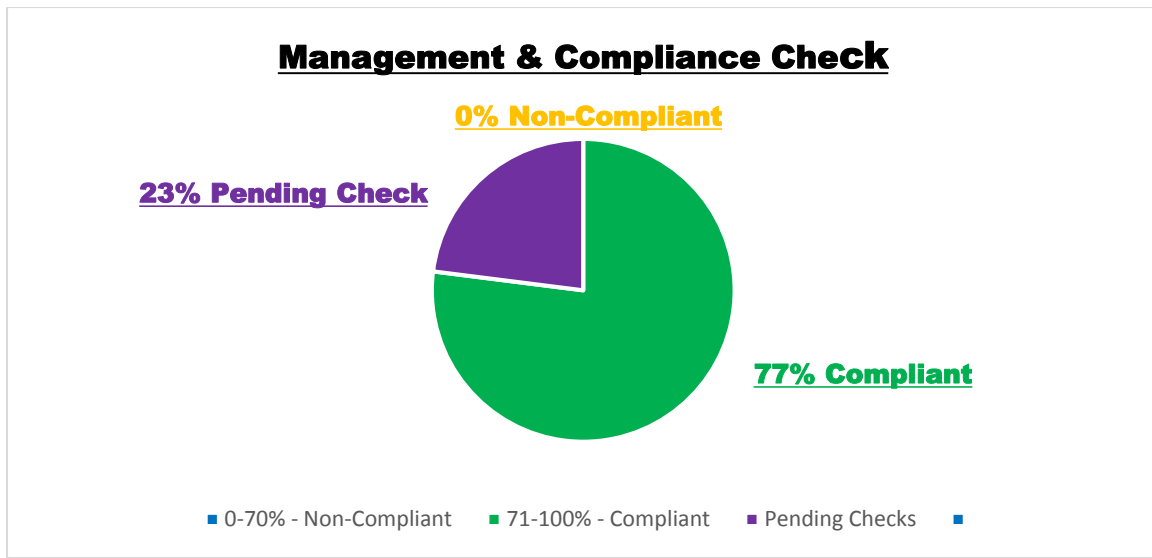
Compliance Parameter – RAG Rating	71-100% = Compliant (Green)	41-70% = Remedial work required, action plan in place (Amber)	0-40% = Non-Compliant, immediate action required (Red)
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Establishment	School Representative	Management & Compliance Officer	Date of Compliance Check	Overall Compliance Rating %
Crug Glas Special School	Jo Watkins	Nic Overton	Cancelled due to Covid-19, TBC	
Ysgol Pen Y Bryn	Sian Hodge	Nic Overton	Cancelled due to Covid-19, TBC	
Pontarddulais Comprehensive School	Dylan Jenkins	Peter Webster	11 AUG 2021	96%
Bishopston Comprehensive School	Michelle Box	Nic Overton	Planned 22 OCT 2021, Cancelled due to ongoing Band B works, TBC	
Birchgrove Comprehensive School	Jo Jones	Nic Overton	15 JUL 2021	86%
Dylan Thomas Community School	Rosina Frew	Nic Overton	14 SEP 2021	77%
Penyrheol Comprehensive School	Verna Jeffreys	Nic Overton	27 JUL 2021	88%

COVID 19 has placed significant pressures on education as a whole and this provision remained operational throughout the pandemic and thus disrupted the undertaking of the management and compliance checks. It is recognised that these pressures have tested the resilience of staff over the last 2 years. Despite these significant challenges, the Head teacher's and all staff within each school have demonstrated high levels of compliance where possible with our statutory obligations. These are highlighted within *Fig 1* and Appendix

Fig 1

Olechfa Comprehensive School	Wayne Tompkins	Peter Webster	23 Jun 2022	96%
Cefn Hengoed Comprehensive School	Gemma Price	Andrew Beale	15 MAR 2022	94%
Pentrefafod Comprehensive School	Andrew Barrett	Nic Overton	29 SEP 2021	97%
Gowerton Comprehensive School	Sarah Hunt	Nic Overton	11 OCT 2021	96%
Bishop Gore Comprehensive School	Steve Thomas	Peter Webster	28 SEP 2021	92%
Bishop Vaughn Comprehensive School	Kath Jones	Nic Overton	24 SEP 2021	85%
Maes Derw PRU	Amanda Masters	Peter Webster	24 NOV 2021 / 15 JUL 2022	88%
YGG Gwyr	Mari Jones	Nic Overton	Planned 29 OCT 2021, Cancelled due to unforeseen circumstances, TBC	
Morrison Comprehensive School	Angela Wellington	Nic Overton	27 OCT 2021	100%
Ysgol Bryntawe	Eirian Leonard	Nic Overton	6 OCT 2021	94%



Glazing - Regulation 4

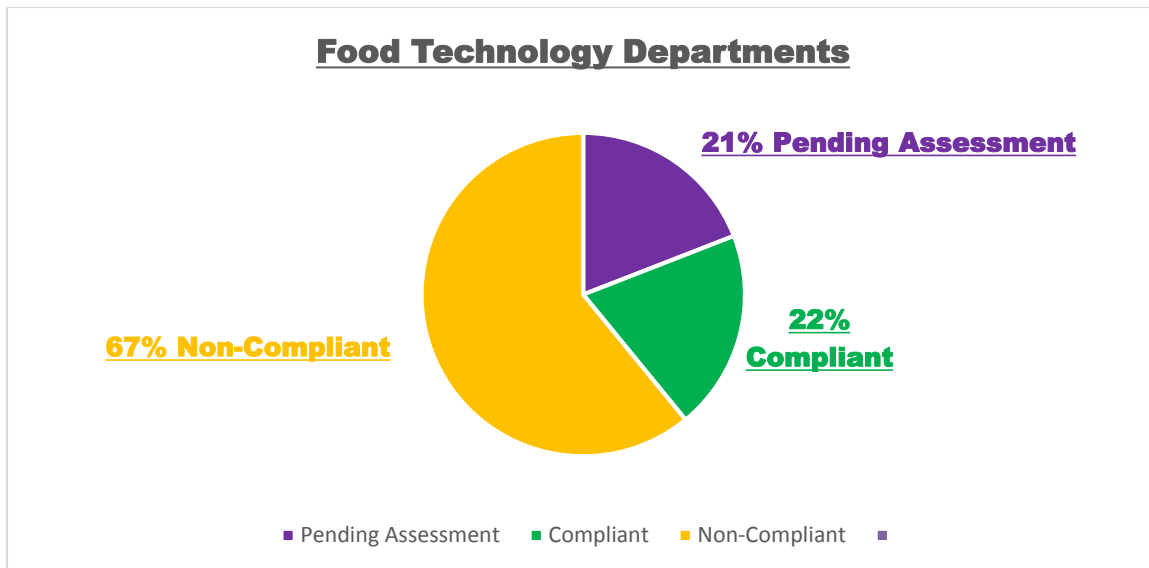
Glazing and the premises risk assessments highlighted non-compliance due to the expiry of warranty to safety film applied to glazed units across a number of sites within the education stock to which Building Services have been notified as they hold and manage the budget. It was also noted that the on-site glazing risk assessments required a detailed review to highlight where additional remedial work has been completed.

Food Technology Departments / AQT, cleaning and maintenance of systems

Concerns were highlighted during the Compliance Check schedule, highlighting a potential risk around the Food Technology provisions concerning the servicing and maintenance of equipment that include a range of gas and electric appliances along with Air Quality Testing (AQT).

Early discussions with colleagues in education and Building Services, resulted in a strategy around planned servicing and maintenance being agreed to identify all schools and PRU's with a dedicated food technology suite have to ensure that it meets the requirements of AQT and all appliances are maintained to the relevant regulations and standards and communicated to all relevant sites. Consideration should be given to a review of the SLA provision that are offered to all schools and PRU's. Thus allowing compliance to be maintained across the stock of the authority.

The overall compliance within Food Technology Departments where planned and preventative maintenance was being undertaken as part of an SLA agreement has been highlighted below.



As part of school investment and internal refurbishment, it is essential that all Head Teachers are provided with detailed information regarding the requirements of the servicing and maintenance of the equipment. Ensuring suitable and appropriate SLA's to be secured at the earliest opportunity and prior to the expiry of any equipment's warranty.

Given the change in regulation around Food Technology and the need to approach such facilities as a commercial kitchen, it is essential that all extractor and ventilation systems comply with DW172, RRO and Gas regulations.

Schools must evidence compliance with DW172, "Guide to good practice internal cleanliness of ventilation systems" and consult with Building Services to agree and adopt an acceptable safe cleaning system that is reasonably practicable and proportionate to the risk.

Any cleaning schedule of hood filters and supporting components of the extractor units should be noted within the buildings Fire Risk Assessments, cleaning schedules agreed and communicated to all appropriate staff to ensure compliance is maintained.

Safety Pre User Checks – D&T and LEV equipment

Non-compliance has been highlighted as part of the on-site pre user checks and it is advised that a review of all schools supporting documentation is reviewed. It is noted that some schools have a varied approach in this and are reminded of the importance of visual inspections. Good practice was noted in Gowerton Comprehensive School where safety pre user checks were undertaken on all D&T equipment and independent LEV systems. This placing confidence with over all compliance in both COSHH and PUWER regulations.

The management and Control of Legionella

Overall compliance of the management of Legionella across schools have raised some concern in regards to the method of recording testing and inspections of water systems and Thermostatic Mixing Valves (TMV's). It is noted that documentation has been missing from files and inconsistency with the testing frequency. As these anomalies were highlighted, key representatives within Building Services were notified and remedial work undertaken to ensure all documents were updated where required.

It should be noted that there is a responsibility on all schools to closely monitor the frequency of testing and inspection of water sources and where there appears to be any inconsistencies, must be reported at the earliest opportunity to Building Services.

Standardisation of key documents within the Legionella portfolio should be undertaken along with an updated management structures to be included within section 2.2 of the legionella risk management pack. Given remote working and some constraints within the team, placing updated documents onto staff net, allowing easy access by schools will promote a standardised and consistent approach in documenting water quality and temperature testing.

Lifting Operation and Lifting Equipment (LOLER 98)

Areas of non-compliance were identified with the planned inspection of LOLER equipment with regards to hoists and slings.

Regulatory Reform Fire Safety Order 2005/ BS9999 Requirements

It was reassuring to see that most schools have adopted the fire management folder that supports all risk assessment and servicing and maintenance records. It is essential that all council facilities apply a standardised and consistent approach in document storage and control where possible. This also assists in any regulatory audit visits. All testing and inspection of fire alarms systems were compliant with legislative requirements, however the process of documenting these will require close monitoring.

As part of the 3rd party letting process, a review of the all-weather pitch EAP has been completed to support schools that are hosting letting on grass, artificial and all-weather pitches, thus simplifying the emergency evacuation process.

Sharing of documentation

Servicing and maintenance records are essential for all Premises Managers to confirm that the testing and inspection of mechanical, gas and electrical installations are undertaken within a time schedule. In addition to this, maintenance records for fire hydrants and pressure vessels are critical to support the sites fire risk assessment and managing any foreseeable risk. During the schedule of compliance checks, close communication has been maintained between the management and compliance officers and key stakeholders within Building Services to gain assurances that key service documents are provided to premises managers following

their inspection schedule and this has been disseminated to all service and maintenance staff.

Best Practice

As part of the Management and Compliance Check, a range of best practices has been highlighted and this has been documented within individual premises compliance check reports. It is essential to capture this information to support continuous improvement and the sharing of best practice is fundamental in the process. Areas of best practice that should be considered to strengthen existing arrangements and will also support a quality assurance and standardised approach.

Documentation

Gowerton Comprehensive school have developed excellent safety pre user checks for all D&T and LEV equipment. The nature of the document allows any competent staff member to undertake a detailed and comprehensive safety inspection of all equipment, highlighting the key components. In the interest of operational continuity and best safety practice, it is advised that these are shared with other schools and CHSEMWS with the aim of further develop, i.e. pictorial diagrams and implemented across all D&T provisions.

Pentrehafod Comprehensive School have developed a 3rd party letting package that offers a range of documents to support the lettings at the school. This included a detailed safety presentation and hand out, room hire agreements that are reflective of use and the site emergency arrangements highlighting a pictorial map clearly identifying the safe evacuation routs from the site. These should be promoted as good exemplars for other school's documentation

The management and compliance culture within Morriston Comprehensive School was outstanding. Both the business manager and site manager have maintained robust systems and procedures including servicing and maintenance of equipment in line with all statutory requirements. The school have been proactive in their approach in the development of new documentation that include legionella testing for site staff and fire testing arrangements. Thus providing reassurance and confidence in how they are managing a complex building, utilising a shared facility with Freedom Leisure.

Further Considerations

Quality Assurance can become integral to any improve strategy in regards to compliance. Due consideration should be given to sampling documentation at planned intervals to ensure that all testing and inspections are undertaken in line with British standards and contract requirements. This will also provide reassurance for operation managers and to highlight any shortcomings are the earliest opportunity.