

# Riverside Customer Voice Executive Scrutiny Panel

## Report on Building Safety Customer Communications

July 2024

### Contents

- 1. EXECUTIVE SUMMARY.....2
- 2. BACKGROUND .....3
- 3. SCOPE .....3
- 4. OBSERVATIONS .....3
- 5. FINDINGS.....4
  - 5.1 – JOE ROBINSON – STRATEGIC BUSINESS PARTNER, BRAND & MARKETING .....4
  - 5.2 – NICOLE CLARK - HEAD OF COMMUNICATIONS, BUILDING SAFETY.....5
  - 5.3 – SHARON HOLLOWAY - BUILDING SAFETY MANAGER.....7
- 6. RECOMMENDATIONS .....10
- APPENDIX A .....11
  - A1 - HIGH RISE VISIT – DEALCROFT .....11
  - A2 – LYMECROFT BESPOKE RESIDENT ENGAGEMENT PLAN .....11
- APPENDIX B .....12
  - SUPPORTING DOCUMENTS.....12

# 1. Executive summary

1.1 Following the introduction of the Building Safety Act (2022), the safety of residential high-rise blocks is heavily regulated. Residents in high-rise buildings have more say in how their building is being kept safe and are able to raise their concerns directly to their owners and managers of their buildings.

1.2 The RCVE Scrutiny Panel did not examine The Riverside Group's (TRG) compliance with the legislation and regulations. We are unable to comment on whether TRG is meeting its obligations under the Act, nor are we not qualified to assess compliance. That is the job of TRG's experts and the Building Safety Regulator.

1.3 This report focuses on how TRG communicates with its customers about Building Safety. As TRG customers we understand what it is like to receive communications from our landlord. We are well placed to stand in the shoes of our fellow residents and look at the communications through their eyes, and that is what we did during this scrutiny exercise.

1.4 In summary, we found that there are still areas of communication that need to be worked on. However, there appeared to be a lack of urgency from TRG to resolve the outstanding tasks. In our view, residents' safety is paramount, and Building Safety should be a top priority for TRG. Yet, we found several examples of work-in-progress or arrangements still needing to be sorted out. These findings troubled us, as we were not given convincing explanations as to why the matters had not been resolved, or timescales for completion.

1.5 On the last point, TRG does not have a strategy or action plan which comprehensively addresses the issues that we have identified, and we were told that it would take several months to create one. We carried out this scrutiny exercise at a time when TRG and One Housing Group (OHG) are still going through an alignment process. Assets has created its own Head of Communications and Building Safety Manager roles and there is an existing Brand & Marketing department. Through interviews, all those colleagues mentioned communication matters that still need to be resolved. We were left with a sense that no-one is co-ordinating the different teams and there is no evidence of an over-arching strategy. This is an unacceptable position for TRG to find itself in and there seems to be a lack of urgency about pulling the strands together and creating a strategy.

1.6 There were several practical improvements that came to light during the exercise and which we have identified in our recommendations and observations. In our view, much of the communication from TRG is too wordy. While some TRG communications must rightly meet legal obligations under the Act, TRG must work harder to communicate about Building Safety in ways a broad cross-section of customers can understand. For example, we are recommending the introduction of pictorial instructions to help explain what to do in case of fire. Pages of text in English and dull proformas are no use to many TRG customers. As with our scrutiny of Damp & Mould communications, we are of the view that TRG uses too much corporate language, which is likely to alienate customers. TRG cannot afford to do this when the subject is so serious.

1.7 'Urgency' was the word that kept springing to mind as we looked at the arrangements for Building Safety communications. We acknowledge the amount of hard work that TRG and OHG staff have put into meeting the requirements of the Act. Clearly, there was a great deal of essential work

to do in a relatively short space of time. However, customer communications are an integral part of keeping residents safe. We think there needs to be a push and a plan to complete the communications aspect of Building Safety – and a sense of urgency to do so.

The majority of the Building Safety Act 2022 became law in January and April 2024. By July 2024, some customer communication arrangements are still not complete, and a communications strategy is reportedly months away.

## 2. Background

The Scrutiny Panel (SP) was tasked with reviewing Riverside's Building Safety communications with The Riverside Group (TRG) customers. The project ran from April to July 2024.

We walked in the shoes of a TRG customer, examining the communication process implemented by Riverside to ensure that all customers were covered, and all avenues of communication were used to ensure the correct message was communicated most effectively.

A range of methods were used to conduct the scrutiny including interviews, presentations, demonstrations, customer journey-mapping, research, and document and webpage reviews.

## 3. Scope

Review Riverside's Building Safety customer communications with particular focus on:

Walking in the shoes of a customer going through the new process, and;

- Examining the communication process implemented by Riverside to ensure that:
- all customers are covered
- all avenues of communication are used, to ensure the correct message is communicated most effectively.
- Attempt to answer the question: If a simulation were carried out today, would the communications system work and pass the test?

The project focuses on the 11 high-rise blocks owned by The Riverside Group.

The 82 high-rise blocks owned by One Housing Group were outside the scope of this project.

Homeowners and leaseholders were not included in project.

## 4. Observations

4.1 The Fire Safety message is vague. Considering what happened at Grenfell, customers would likely ignore the 'stay put' advice given in communications. The instructions are vague and needed a definite message in each high-rise.

4.2 Furthermore, the Evacuation Policy should be clearly outlined in a communal area, and this should be in a bespoke fashion relevant to each building.

4.3 We have reservations about the Building Safety information on the physical notice boards as the administration is prone to being inconsistent. We think hard copies of some of the pages posted on the digital screens should be posted on notice boards, as the digital notice boards are small, and the page turnover rate is slow.

4.4 Housing Officers should carry out a pro-active visit to customers every 12 months to complete checks. This could be face-to-face or via phone call. We were referred to pre-tenancy visit protocols and had not received information about how these are conducted in relation to the Building Safety element by the time this report was drafted.

4.5 We remain to be convinced about whether Building Safety is being covered in the post-tenancy visits. Face-to-face communication between Housing Officer and customer would be preferable.

4.6 The Scrutiny Panel felt strongly that email communications cannot be relied upon. We were not convinced that customers without email would receive the same information or the format it would take.

## 5. Findings

### 5.1 – Joe Robinson – Strategic Business Partner, Brand & Marketing

On 24<sup>th</sup> June 2024, the scrutiny panel met with Joe Robinson, Strategic Business Partner, Brand & Marketing. Below is key point identified in the discussion.

- a) The Customer Communications Plan 23-26 (CCP) was approved in principle in Dec 22 but fully approved by CEC in April 2023, but more work is needed on the layout.
- b) In 2019 Riverside communicated was mainly through an e-newsletter and printed version called 'Your Riverside' and this was published every 3 months. However, this wasn't fit for modern communications world and was not working for customers.
- c) The new CCP was informed by iCommunity and RCVE and looked at giving customers a more targeted experience. Riverside is still working through how it is going to work.
- d) Prior to the advent of the CCP, there was an annual fire safety information leaflet and everyone now and again a publication of hot topics.
- e) Digital notice boards are present are managed by Building Safety Manager (BSM). However, the Strategic Partner, Brand & Marketing, is of the view that the central comms teams would be

better placed to manage these boards. We liked the fact that the BSM manages the information being placed on the boards, as she is the expert on the subject. Either way, the issue of who manages the boards needs to be resolved.

- f) If there is a language requirement, the customer needs to call CSE and will be put through to the language line who will work with them to translate. Language line is free to customers and recharged to Riverside.
- g) The Scrutiny Panel's suggestion to create pictorial information for residents, like those used on aircraft and in hotels was acknowledged by the Strategic Partner, Brand & Marketing as reasonable.
- h) Since the changes in legislation, every person living in a high-rise block should now get a copy of the fire risk assessment every year which includes general guidance and a full risk assessment breakdown and the details of the Accountable Person. This is now the flagship communication that will run a rolling basis as the inspections take place. This is a highly managed process that has been put in place.
- i) Scott Barnett is the Accountable Person and whilst he is the accountable person, customers would not speak to him direct, but put through to the Building Safety Communications team.
- j) There is no mention of Building Safety in the 'Welcome to Your Home' booklet.
- k) Teams and staff roles are not mentioned in the Building Safety Resident Engagement Strategy. This oversight needs to be addressed.
- l) Riverside Comms are not asked to carry out Equality Impact Assessments as standard. Through the process to look at all the new work on the Regulator of Social Housing Consumer Standards and EDI requirements, led by Barbara Whitrow and Stella Hughes, TRG is de facto already carrying out EIA assessments on customer communications processes, but the outcome of that work is pending.

## 5.2 – Nicole Clark - Head of Communications, Building Safety

On 24<sup>th</sup> June 2024, the scrutiny panel met with Nicole Clark, Head of Communications for Building Safety. Below is key point identified in the discussion.

- a) According to the Head of Communications for Building Safety, fire safety signs can produce confusion, and this is currently a high-priority topic now in Riverside. Due to timing issues, we were not able to obtain further clarification before this report was drafted. But this statement is concerning and will be followed up by the Scrutiny Panel in further meetings with TRG senior management. As per the Executive Summary, we question why has not been addressed as a matter of urgency.

- b) In the Head of Communications for Building Safety's view, One Housing is on top of sending out customer communications and Riverside stock is now being looked at. As per the Executive Summary, we were unable to ascertain a plan or a timetable for bringing TRG communications in line with OHG.
- c) A project has started to look at signage primarily paper notice boards at Riverside. We were not given a timeline for this work.
- d) Education of residents is also being looked at, and annual meetings with residents (Annual Resident Engagement Strategy Review meetings) are now a regulatory requirement. When the Scrutiny Panel looked at the invitation letter, we once again found it wordy and the title of the meeting to be corporate-sounding and a turn-off for customers.
- e) The Head of Communications for Building Safety explained that is 'a lot going on in the background but there are a lot of projects to work on regarding these issues'. We once again question whether a strategy exists that pulls all the strands together and sets deadlines to achieve completion.
- f) Regarding One Housing Building Safety communications, the Head of Communications for Building Safety explained that a specialist team had been brought in and they were strong on legislation. There was 100% focus on communication and cladding remediation and fire safety communications had been looked at closely.
- g) Customers who face language barriers can contact the Customer Service Team who will arrange translations services and then refer them to the Building Safety Team. Housing Officers for the high-rise buildings are fully informed of the process. They work closely with Building Safety Inspectors and the Building Safety Manager.
- h) Information is provided in tenancy starter packs including the evacuation policy and fire related risk information along with Building Safety Inspector's and Manager's details.
- i) Tenancy starter packs are not available in other languages. There is no clear policy approach currently for multi-format print, e.g. braille and other languages. These types of packs need working into the system.
- j) However, when a tenancy is signed then customer should be asked to complete a PEEPS (Personal Evacuation Plan).
- k) Fire Risk Assessment communications are going out annually. A specialist Fire Comms Officer has been appointed by TRG who is dealing with this project.
- l) The Head of Communications for Building Safety confirmed that TRG should know who lives in every flat, but it does not. It is mainly home ownership properties where there is a problem – if the owner sells the property there is no obligation on them to pass on Building Safety information or communications to the new owner. Nor is there any obligation on a homeowner who sub-lets to inform the tenant.
- m) Building Safety section of the website is updated regularly. Information on both the TRG and OHG websites needs to be the same.

- n) The Head of Communications for Building Safety would like a Building Safety tile on the MyRiverside app.

### 5.3 – Sharon Holloway - Building Safety Manager

On 4<sup>th</sup> July 2024, the scrutiny panel met with Sharon Holloway, Building Safety Manager, Liverpool City Region. Below is key point identified in the discussion.

- a) Building Safety Inspectors, Senior Building Safety Inspectors carry out weekly inspections and sometimes the Building Safety Manager (BSM) will perform a complete walk around herself. Fire alarms are tested weekly.
- b) Vulnerable customers are identified through communication with residents and inform them that they have a duty to provide any relevant information and keep this updated. The BSM explained that at Resident Engagement meetings she asks if anybody is concerned about another resident to contact her further to discuss their concerns. TRG is somewhat restricted by GDPR when it comes to identifying vulnerable tenants.
- c) When the customer moves in, they would have had a conversation at the initial sign-up. Language barriers and literacy issues should be picked up in these conversations.
- d) The BSM commented that communications between Riverside and customers' needs work and that the strategy that is in place will make it a lot better. She felt that education is needed to help people understand why the procedures are in place in order to keep them safe. However at our interview the BSM was unsure of timescales for implementing the various actions that have been identified by TRG.
- e) The Scrutiny Panel worked with the BSM to test how communications operate using the checklist on pages 4 & 5 of the Building Safety Resident Engagement Strategy (October 2023). Our findings are in blue:
  - Details of the measures in place to mitigate potential building safety risks, e.g. fire precautions. Should be included in the information pack.
  - Advice on how to reduce the risk of fire in individual dwellings e.g. by not storing flammable materials. Should be included in the information pack and included on the digital notice boards.
  - *The process for reporting a fire risk and/or raising any other safety concerns.* Included in the bespoke resident engagement plan and any contact numbers are on the digital display.
  - What to do in the event of a fire in the building and a clear explanation of the building's evacuation strategy. Given when moving in and included on the building notice boards.
  - Clear explanations of the roles and responsibilities of Riverside, the Building Safety Manager/Property Manager, and residents. Set out in the bespoke plan for each high-rise.
  - Details of building safety inspections and planned compliance programmes taking place throughout the year. Customers will be told a certain day the inspection will occur.
  - Advice on how to test safety systems around the home, e.g. smoke alarms. Sent out 12-monthly.
  - Contact details of the Accountable Person and Building Safety Manager. See above.
  - Outcomes of building safety inspection checks, including Fire Risk Assessment of External Walls and EWS1 forms. Published for those customers are interested.

In addition, the following Fire safety information will be shared with residents in accordance with Fire Safety Information (S156 Building Safety Act 2022):

**Risk Identification:** Tenants will be informed about any specific risks identified in our fire risk assessment, ensuring they are aware of potential hazards. TRG delivers this information in paper form, and if risks are identified that are detrimental to the building, TRG would arrange a site visit face-to-face. TRG can also invite contractors to come along to explain everything to residents.

**Prevention and Protective Measures:** Details about prevention and protective fire safety measures provided for the safety of any or all occupants (such as the means of escape, the measures to restrict the spread of fire and what people should do in the event of a fire) will be communicated, empowering tenants to actively contribute to fire safety. As per previous point.

**Responsible Person's Identity:** Tenants have the right to know the name and address of the responsible person overseeing fire safety on the premises. Building Safety Manager.

**Identity of Assistant:** If an assistant is appointed to aid in fire safety management, (i.e. implement firefighting measures) their identity will be communicated to tenants, fostering a sense of accountability. The identity of the Assistant had not been clarified at the time of writing this report. If a Waking Watch is implemented, TRG provides this information to all residents including the name of the company and the contact person. The information is provided via letter and email and posted in the communal areas.

**Reported Risks:** Any risks reported to the responsible person will be communicated to tenants, promoting transparency. Within the process discussed above.

- f) If a flaw in the system is found, all information should go to the BSM. TRG are developing a system where, if urgent actions come through for instance, the system will notify whoever needs to be involved and can schedule meetings about the issue and escalate it.
- g) Bespoke devices can be provided for customers with hearing loss that have flashing/vibrating lights, and these are looked at on sign up. (Note: The TRG Disability Group have been looking at this and identified the issue that these are not being maintained.)
- h) OHG send out quarterly newsletters on general building safety and this communication is being rolled out to TRG customers. The Scrutiny Panel were invited to review a draft of the first TRG newsletter. However, the Scrutiny Panel found the OHG version wordy and lengthy and not particularly customer friendly.
- i) Fire Safety annual communications sit with the Building Safety Communications team.
- j) The Building Safety Resident Engagement Strategy has gone to all high-rise customers of OHG and TRG. There were only 7 responses in total which does not surprise the Scrutiny Panel as we felt this was not easy to read and needs to be more customer friendly.
- k) Focus for OHG has been cladding remediation works. Quarterly updates are sent out to residents who require work. TRG do this slightly differently – they communicate through website links which is different to OHG. We agree with the Head of Communications for Building Safety, who takes the view that consistency was needed across OHG & TRG. (Note: Only two TRG blocks are



affected, both located in Manchester.) We support this view and see it as another example where Building Safety communications need to be prioritised.

- l) More generally, although the TRG and OHG websites are updated with Building Safety information, regularly, information on both websites needs to be harmonised.
- m) By law a meeting must be held with customers of high-rise every 12 months. A fire safety talk with customers is given to ensure customers feel safe. This session provides the following:
  - Opportunities to ask questions and raise concerns.
  - Opportunity to become a local advocate for the building.
  - Opportunity to scrutinise how the building is managed.
  - Talk about customer responsibilities.
  - Customers can report issues to ensure repairs are done.
  - Homeowners need to seek permission to make alterations
  - Opportunity to get across to people the importance of fire safety and how they can play their part.
  - Managing expectation.
  - Opportunity to communicate and share relevant information, e.g. customer may have broken their leg and need assistance.
  - Testing of fire alarms, emergency lighting etc. (High-rises are inspected weekly).

The safety packs are unique to each building, and we studied the Lymecroft version (see below).

## 6. Recommendations

1. Create pictorial safety information for customers in high-rise, like that used on aircraft and in hotels. To be included in all welcome packs and displayed on all notice boards (including digital). This should also be displayed on every floor of the building and in the communal areas.
2. Make Tenancy Starter Packs available in other languages. Establish a clear policy approach for multi-format print, e.g. braille and other languages.
3. Re-draft the Building Safety Resident Engagement Strategy to make it customer friendly. Teams and staff roles are not mentioned in the Resident Engagement Strategy. This oversight needs to be addressed.
4. Align TRG's and OHG's communications about remediation works. OHG send quarterly newsletters and TRG uses weblinks.
5. Information on both OHG and TRG websites needs to be the same.
6. Develop a tile for Building Safety on the MyRiverside app.
7. Update the 'Welcome to Your Home' booklet to reference Building Safety.
8. Replace the current digital notice boards with much larger screens and improved functionality so customers can scroll through the pages. Surround the boards with Perspex to protect them against vandalism.
9. Building Safety manager to attend Regional Hub meetings to discuss Building Safety matters.
10. Prioritise work on fire safety signs in high-rise, which have been described as confusing by one manager.
11. Contact numbers and names of all accountable officers need to be at the top of the page on the bespoke Building Safety document in the tenancy starter pack, so customers do not need to search for them.
12. If a number is unavailable calls should be redirection/transferred. This needs to be added to a poster.
13. Need wording for the point about updating the fire box with vulnerable tenants' details.
14. Introduce a system to regularly maintain the devices that are issued to customers who are hearing impaired the hard of hearing. These devices are currently not being maintained by TRG.

# Appendix A

## A1 - High rise visit – Dealcroft

The Scrutiny Panel carried out a site to Deal Croft in Woolton during July and was left with a sense that TRG is not entirely engaged in fixing issues raised to them by customers.

We had concerns over whether customers are receiving feedback on the progress/resolutions unless TRG is prompted.

We noted the following observations:

- Persistent offenders who leave clutter in corridors should have more severe consequences for infringing on the sterile environment of the corridors.
- The two customers that lived in the building we visited stated they did feel safe, by and large.
- We query whether Riverside has the staff and resources to meet the guidelines set out for customers?
- Riverside did not appear to be jumping on issues that have been reported fast enough. For example, there was a damaged fire door in the community room that had been reported months before and still not repaired/replaced.
- We asked to see evidence of how Salesforce is being used by the Housing Officers to log issues with tenants. We want to know are things being recorded and how Housing Officers are communicating with people about Building Safety matters. At the time of writing this report, we had been unable to obtain this information.
- Securing redundant parts: we question whether Riverside should procure two of the parts needed to repair the Building Safety component in question so that should it break again there does not need to be a wait to fix it.
- In our view the fire safety information should be placed on every floor.
  - At the time of writing, we were unable to establish who is responsible for updating the information about vulnerable customers kept in the fire box.
- There are opportunities to improve engagement by potentially organising a ‘fayre’ for building blocks, or groups of blocks to improve visibility of the resident housing officer etc.

The digital notice board was remarkably small and Scrutiny Panel members walked past it without noticing it. It took a few minutes for all the pages to turn, and the fast-forward function appeared to have been turned off, so customers could not scroll through. A subsequent review of all the pages found them to be generic and wordy and difficult to read due to the size of the screen.

## A2 – Lymecroft bespoke Resident Engagement Plan

The Scrutiny Panel carried out a review of the Lymecroft bespoke Resident Engagement Plan and noted the following points:

- TRG is providing the right information at the time of sign-up but that it was the bare minimum.
- TRG is not taking the information to ground level to the customer. Communication is not effective; it is too fussy.
- Laminated pictures are needed on each floor – if a fire broke out customers do not have time to look for paperwork so could rely on signage in hallways.
- The question was raised regarding what happens if a customer becomes disabled after moving in – would that person be rehoused? It was felt that TRG would do what is possible to find suitable accommodation but practically speaking how soon would this be?

- Resident Engagement Meeting: the Scrutiny Panel noted that the wording is incorrect for frequency of meetings. Paperwork states 2-weekly meetings, but the Housing Officer at Woolton had previously confirmed that these were monthly.
- For a bespoke leaflet, we did not feel that it was bespoke as no specific information or names are given in the document. This sends the user on another trail to find the correct information.

## Appendix B

### Supporting documents

1. The Riverside customer communications plan (CCP)



Customer  
Communications plan

2. The Building Safety comms plan



Building-Safety-Eng  
agement-Strategy-V

3. Safety and Support web section [Safety & support - Riverside](#)
4. A copy of the welcome pack



000970\_RSDEng\_we  
lcome\_brochure23\_C

5. A copy of the new FRA communication from the pilot which is effectively a customer's annual fire safety communication where they live in a building subject to FRA [Fire Safety in your home and building \(campaign-archive.com\)](#) / previous iteration here for reference [Fire safety in your home and building \(mailchi.mp\)](#)
6. Sample copies of BAU communications:
  - Example 1 – Fire safety meeting invite [Fire safety meeting for customers: 11/05/24, 11am at Somerford House \(mailchi.mp\)](#)
  - Example 2 – Smoke/CO2 visit [Important - installation of smoke detection / carbon monoxide detection in your home \(mailchi.mp\)](#)
  - Example 3 – Building survey notification [Important message from Riverside - we're carrying out a survey at your building soon \(mailchi.mp\)](#)
7. One Housing Group newsletter - : <https://www.onehousing.co.uk/resident-services/resident-information/keeping-you-updated>