

## DOCUMENT REVIEW COMMENTS FORM (QR 2)

Project Name:	Housing Association Guide Project	Product ID:	Housing Management Guide
Product Name:	<b>Maintenance Guide</b>	Author:	Seamus Hillock
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Comments due back by:	30 June 2010	Date of DSD response issue:	
Reviewers:	NIFHA	Date QR3 complete	

No:	Page No:	Para No:	Comment	Raised by:	Accepted / Rejected	DSD Response
1.	3	7.2	Protecting the public purse is incorrect as this ignores the financial contribution made by Associations in both building and maintaining their property			
2.	3	7.3	Refers to the objectives within the Associations' maintenance strategy – how will ensuring the stock is maintained in a lettable condition that exceeds statutory minimum requirements be measured. Where are the statutory minimum requirements outlined? Will these be used as a benchmark that Associations will be assessed against?			
3.	5	7.8	Is it considered reasonable for a small Association to appoint a member of staff for maintenance?			

4.	5	7.9	<p>The application of the 60/40 industry standard is considered to be unrealistic given the diversity in the number of and conditions in properties, the range of tenants and their varying needs.</p> <p>Could this standard be introduced incrementally, allowing Associations to move to this over a period of time?</p> <p>Does the 60/40 ratio refer to the number of items or their monetary value?</p> <p>The ratio of planned and cyclic maintenance can vary from year to year, especially in the case of small Associations – it may be helpful if this were assessed on a 5 year average ratio.</p>			
5.	7	7.13	<p>Associations will be required to ensure that “good practice guidance”, is followed to develop and maintain robust stock information. How is good practice guidance defined? Is there a benchmark for “good practice guidance”? Will Associations be assessed against this benchmark?</p> <p>If this is the case Associations will need to have this clarified to ensure they have detailed knowledge of the standard they are to be measured against.</p>			

6.	7	7.14	The first six bullet points of this paragraph would be more suited in a Guide that illustrates how Associations should communicate with their tenants. This contains general advice on communicating with tenants and community groups but the way this is written is not specific to maintenance and would be better placed in a more general part of the guide.			
7.	8	7.16	We question the rationale behind increasing resources for post inspection and reducing them for pre inspection. How have DSD arrived at this conclusion?			
8.	10	7.19	How does DSD define the term partnering? Is there a clear definition available that NIFHA may pass on to its members?			
9.	11		Frequently Asked Questions No answers were provided in the draft document. Is intended to make these available at a future date?			
10.	12	1.2	The general guidance provided regarding this particular issue is brief but reasonable. The draft guide states that a 100% survey is only required in particular circumstances i.e. where the Association does not have adequate information on the condition of its stock. This would seem to state that Associations are free			

			<p>to decide on what the particular circumstances are. This is in conflict with the views expressed by the DSD inspectors at a NIFHA seminar earlier this year.</p> <p>Is a survey of a sample of the stock sufficient on a yearly basis?</p>			
11.	13	2.3	<p>The list of items does not advise Associations which if any of these are mandatory, i.e. they will be assessed against them during a DSD inspection or if any or all of the items are good practice but not essential. The list reads as a check list that Associations will be measured against. Is this what DSD Inspectors will use when assessing Association compliance with the Guide?</p>			
12.	14		<p>Is property valuation a normal part of the stock condition survey?</p>			

13.	15	1.1	<p>Advice on Insurance for Tenants' Responsibilities</p> <p>This implies that technical / housing officers will provide advice on insurance and / or insurance products. They should only recommend that tenants should have their property and possessions insured to protect themselves in case of fire / floods etc. They should only provide more detailed advice on this complex area when they have recognised specialised knowledge of financial products.</p>			
14.	16	1.5	<p>Planned Maintenance</p> <p>The lifespan of a number of items such as kitchen units or gas boilers can vary but the amount of wear and tear must be taken in to account. Periodic time intervals should be used as an indicator and should not be prescriptive.</p>			
15.	17	1.7	<p>Operations</p> <p>Tendering – if measured term contract is not available – does this mean that if the work is not included in a measured term contract then it should be tendered?</p>			
16.	18	1.2	<p>The contents of this is intended to be a summary by DSD but is in fact quite a detailed document – will this be used as a benchmark to measure HA's against?</p>			

17.	19	6.2	This is considered to be unenforceable.			
18.	21	Introd Para	There are significant differences in age, condition and dwelling type between most Housing Association stock and NIHE stock. We therefore question the usefulness and relevance of applying NIHE standards to Housing Association stock. Please explain the rationale behind this to enable NIFHA to pass this on to our members.			
19.	22 & 23	4.0 & 5.0	Any external door / window replacement schemes must meet Secured by Design Standards.  This is a new requirement which will increase costs for Associations. Is this to come into effect immediately? Can this be introduced incrementally when other work is being carried out within the dwelling?			
20.	25	Introd Para	As No 13			
21.	26	10.0	Why is the reference only made to sheltered schemes? There are other types of dwellings where the risk may be much greater.			

22.	27	11	Why should major improvements which include privatisation of entrances etc not be undertaken as part of the cyclical maintenance contract? Surely the Association has to determine the work content specification. Keeping to one type of work in cyclic maintenance may mean that the Association may not take advantage reductions in costs as a result of economies of scale.				
23.	27	15	Legionella Control refers specifically to only one type of installation and makes no reference to recognised guidance. Associations have different schemes where other forms of communal water heating / supply may need to be covered.  The time period for testing is in conflict with the regulations.				
24.	27	16	In the case of newbuild properties is a 10 years inspection period not acceptable?				
25.	29	2.3	Associations have been previously advised that the timescales were for working days – is this a definitive change?				
26.	34		Qualifying Repairs Normally a tenants responsibility.				

27.	37	Recov Char	There is a difference between some items of minimum expected life on this page and the life of the same component under Decent Home Standards. There is also a difference between those illustrated on page 45. Please explain the rationale behind these differences as clarity is needed.				
28.	39	1.1 & 1.2	Does the DSD document satisfy Article 34 of the 1983 Housing Order?				
29.	-	Appendix	<p>Miscellaneous Works</p> <p>This is a major change as the technical background and comment previously provided in the previously existing part 6 (Minor Works) of the guide have been removed and replaced by additional information resources. This will require all Associations to source / produce additional guidance for maintenance staff use.</p>				
30.	-	Misc Works 1.02	The previous part 4 of the guide gave more detailed information when grant aid would or would not be paid. This is a very general guide and does not provide the clarity as before.				

31.		Appendix	<p>Designing Out Crime</p> <p>Is there a difference between designing out crime and the SBD programmes?</p> <p>May we assume from the draft guide that there is no other change apart from those already reflected in new doors and windows to now meet SBD standards?</p>			
32.		Appendix	<p>Fire Precautions</p> <p>Will flats and houses that previously complied with statutory requirements now need to be re-inspected due to higher risk?</p> <p>.</p>			
33.		Appendix	<p>The information sources only give very basic information.</p>			
34.		Appendix	<p>Lead in Drinking Water</p> <p>Why does it refer to NICEIC which is electrical not water?</p>			
35.		Appendix	<p>Radon</p> <p>No reference made to additional NI guidance published in 2009.</p>			
36.		Appendix	<p>Disrepair Criterion</p> <p>A 15 year lifetime for a boiler would not be untypical. An older boiler may not meet energy efficiency expectations, but it will not be necessarily in disrepair.</p>			

37.		Appendix	Thermal Comfort Cosy Homes Standard for roofspace insulation is 270mm. All dwellings should, through time, be upgraded to this standard.				
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