

21/04/2023

# Managing the Compliance Obligations of New Zealand's Largest Portfolio

From the Lens of the Owners representative – Who is an IQP

Grant McNeil  
Manager Compliance



# Introduction

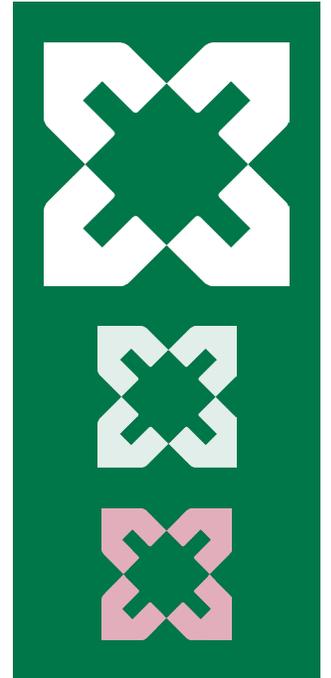
## About me

- Manager Compliance Kāinga Ora
- Previously worked as a Building Compliance and Fire Protection Consultant and Fire Protection Contractor, in roles from on the tools and in the field to Senior Management
- Registered IQP – for a large cross section of active and passive systems
- Currently completing a NZDE Fire Engineering
- Authored fire reports and evacuation schemes for a large cross section of buildings during the 27 years in the building compliance and fire protection industry, including buildings with defend in place strategies
- Schemes I have personally developed include Paremeremo (Auckland Regional Prison), Parliament Buildings, Christchurch Justice and Emergency Services Precinct)
- Passionate about equitable egress



## Agenda - What we are covering today

- The Kāinga Ora Portfolio and “Compliance Portfolio”
- Context regarding fire statistics within the Kāinga Ora Portfolio
- MOU with FENZ
- The challenges of managing compliance in a social housing Context
- Equitable Evacuation in a social housing context, implications of the changes the fire safety and Evacuation of Building Regulations
- Innovation
- Arlington Journey – 1<sup>st</sup> approved Lifts for evacuation in NZ
- Considerations regarding ongoing compliance requirements
- Closing points



# Kāinga Ora

Our name means: **“Wellbeing through places and communities.”**

- We are a crown entity established under the Kāinga Ora – Homes and Communities Act 2019  
Joining the Housing NZ corporation, HLC, Kiwibuild unit from MBIE into one entity

Our role is:

- Kāinga Ora places people from the Housing Register into our homes,
- providing tenancy services to public housing tenants
- Maintains and develop public houses.
- We also provide home ownership products and other services.
- We are charged with delivering more public, transitional and affordable housing to help meet supply
- Leading and coordinating urban development projects.



## Kāinga Ora Portfolio

- Over 71,000 individual Properties (NZ Inc's Largest asset \$40B+)
- 1723 Individual Buildings (apartment Complexes, Supportive Housing, Community Group housing (CGH))
- 691 Individual BWOFF
- 895 Community Group Housing Properties
- 66479 individual inspections (of Specified systems)
- 1098 Trial evacuations per annum

## Kāinga Ora Compliance Team

- Dedicated team
- Contract Management
- Internal SME, IQP, Engineers,
- Advice to Internal Stakeholders
- Fire Safety, Building Compliance, Fire Protection, Fire evacuation
- Fire Safety Policy
- Leads For a number of initiatives and improvements relating to our area of influence



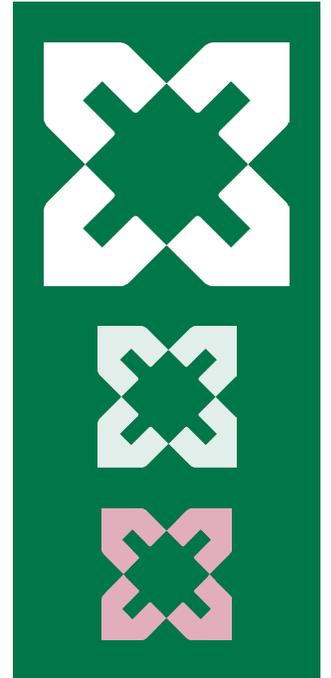
## MOU – Fire and Emergency New Zealand

There is a Memorandum of Understanding in place between Kāinga Ora and FENZ

The key shared goals of the MOU are to:

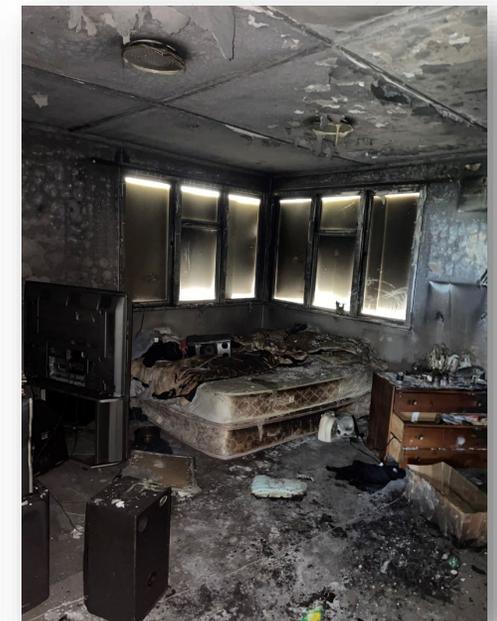
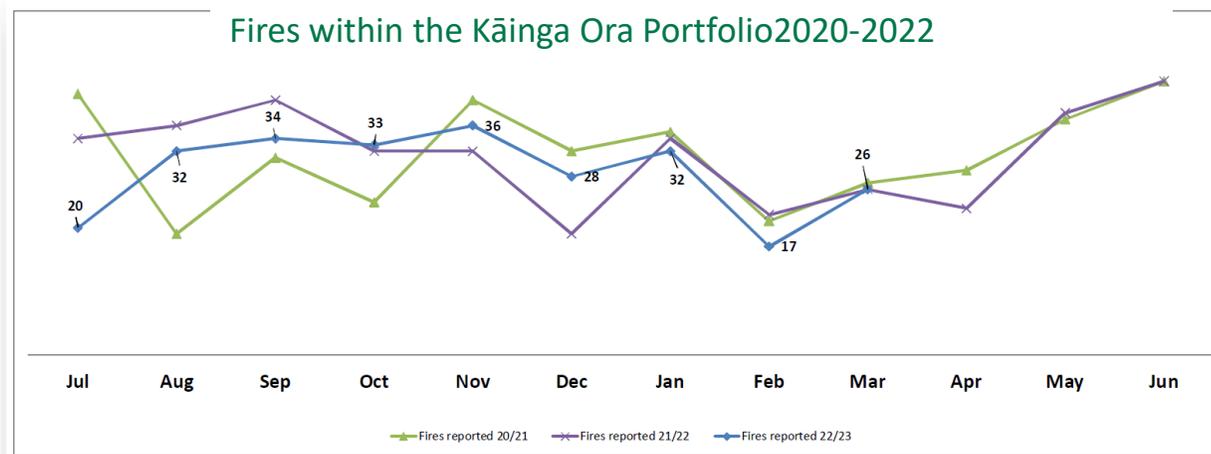
1. Enhance safety and wellbeing of FENZ Personnel, Kāinga Ora Customers and the wider community.
2. More Effective service delivery
3. Improved technical co-operation

There are a number of initiatives where FENZ and Kāinga Ora are working in collaboration, including specified developments, community education, Residential Sprinkler system pilot and other specific projects such as lifts for evacuation, the recent first approval being the Arlington project



## Fires within the Kāinga Ora Portfolio

- Fires do occur within the Kāinga Ora Portfolio.
- We average over 383 fires per year in our homes. [3 year average 2020-2022] with averages of 45 injuries and 2.2 deaths per annum.
- 12% of all residential structural fires nationally occur in the Kāinga Ora Portfolio [Data from FENZ and Kāinga Ora fire incident databases]
- Impacts to customers, displacement, available homes
- Primarily route cause - 48.5% unattended cooking



## Risk Mitigation is Key

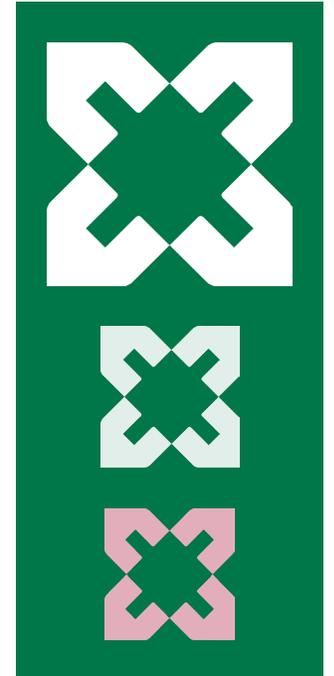
Risk = Probability x Consequence

**Impact**  
*How severe would the outcomes be if the risk occurred?*

→

Probability  
*What is the probability the risk will happen?*

	Insignificant 1	Minor 2	Significant 3	Major 4	Severe 5
5 Almost Certain	Medium 5	High 10	Very high 15	Extreme 20	Extreme 25
4 Likely	Medium 4	Medium 8	High 12	Very high 16	Extreme 20
3 Moderate	Low 3	Medium 6	Medium 9	High 12	Very high 15
2 Unlikely	Very low 2	Low 4	Medium 6	Medium 8	High 10
1 Rare	Very low 1	Very low 2	Low 3	Medium 4	Medium 5



# Key Aspects of Risk Mitigation

To ensure the safety of our customers and mitigate risk as best possible we have the following mechanisms in place:

## Contractual

1. Effective contract management
2. Ownership and partnership
3. Transparency
4. High level of Trust
5. Assurance over contractor deliverables
6. Effective KPI and performance management

## Social

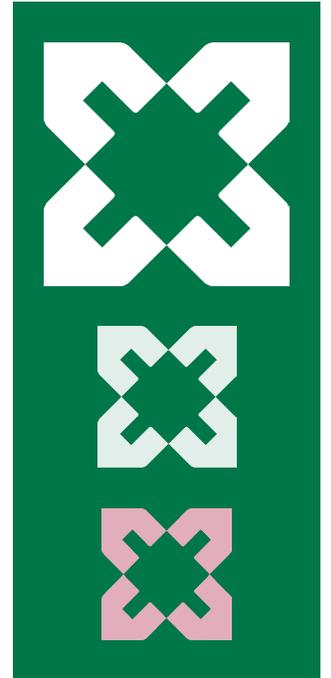
1. Customer relationships
2. Effective placement and management of the Tenancy relationship
3. Education
4. Linkages with other agencies



# Key Aspects of Risk Mitigation

## Physical

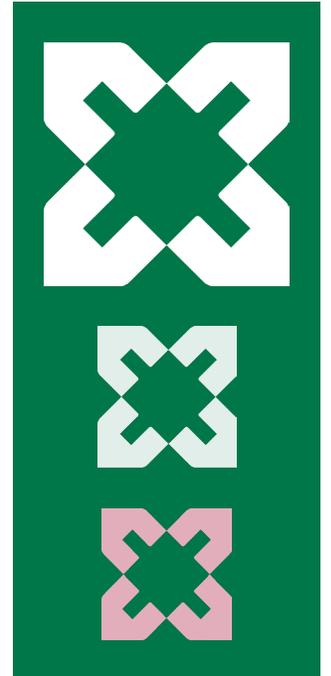
1. Health and safety Inspections of all 71,000 property's 6 monthly
2. Inspections of all properties in accordance with the compliance schedule for BWOF properties
3. Dealing with faults and remedial works promptly
4. Dashboard view of all faults and isolations portfolio wide – understanding risk
5. Inspections of BWOF exempt properties (Community Group Housing) where these properties are deemed a single household unit (to the same level as a BWOF property)
6. Inspections of bespoke systems such as Fire Denyer, interventions for hearing impaired or customers with an Equitable need
7. Prioritising repairs and maintenance ensuring system outages a defects are promptly attended to



# Challenges of Compliance in a social housing Context

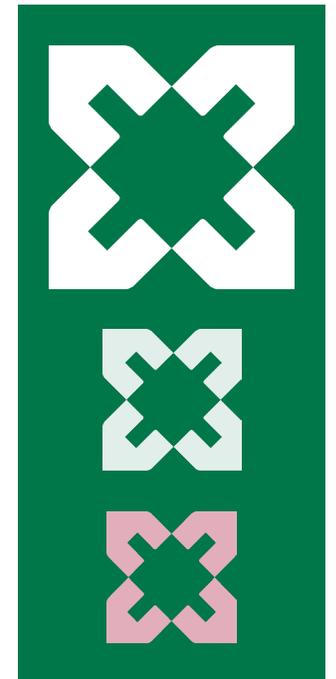
Managing Compliance in a social housing context do present a number of challenges

- Diverse portfolio with some unique complex needs and requirements
- Challenges with Access and Scheduling (having to work within the RTA) – Locksmiths are sometimes required.
- CGH – Housing those with Complex needs, sometimes this means bespoke solutions to meet to the need to lock down a property to protect occupants safety to themselves and others. – access control and voluntary schemes in place with assembly areas inside the property boundary
- TH – Working with providers to ensure compliance
- System and design considerations (building code minimum is not always best approach)
- Oversight of all remedial works and Outages
- Tracking all Inspections
- Education and behaviour management
- Challenging contractor and TA interpretations
- Value for the NZ taxpayer
- Doing the right thing – You cant always keep all stakeholders happy



# GSN

1. GSN is the compliance management portal used by Kāinga Ora
2. Has been in place since 2003 and continually improved over that time
3. Purpose is
  - Manage risk
  - Monitor all inspections, non compliances, reactive works,
  - Hold all compliance records, from inspections, Reports to correspondence, BWOF documentation
  - Every inspection record is held in GSN and outcome, including digital signature
4. Used as a compliance repository for BWOF and Fire evacuation obligations
5. Important contract management tool, Verifies all financial transactions and Payment.
6. Also holds Asset Risk Register for the organisation





**Risks**

<b>Level 1</b>	
BWOF Overdue	0
BWOF On Hold	4
Evacuation Trials Overdue	13
Alarm or Sprinkler Isolations	25
<b>Level 2</b>	
Annual Inspections Overdue	166
6-Month Inspections Overdue	146
3-Month Inspections Overdue	25
Monthly Inspections Overdue	21
<b>Level 3</b>	
BWof Work Outstanding	403
Non-BWof Work Outstanding	194
Trial Evacuation Issues	27

Go to CPI:  **GO >>**

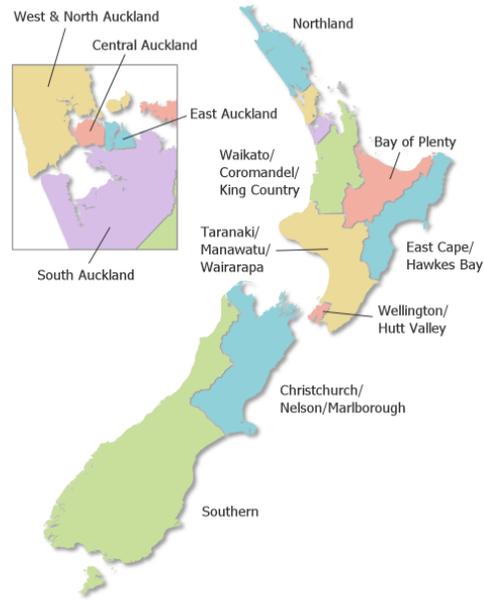
Search by Address:  **Search >>**

**10 Jul 2023**

Inspections Today: 104

Inspections Yesterday: 14

You are logged in as GRANT MCNEIL



CPI	50202	BUILDING DETAILS	
Name	DIXON STREET FLATS	Territorial Authority	<a href="#">Wellington City Council</a>
Number and Street	134 DIXON STREET	Legal Description	Lot 2 DP 8016
Suburb / City	LAMBTON, WELLINGTON	Maximum Occupancy	180
Region	Wellington/Hutt Valley (DCEC)	Build year	1937
Owner	Wellington NU	Level/Unit	12/117
Fire Compliance type	Evac Scheme	Bldg Compliance Type	<a href="#">BWOF</a>
Compliance Contractor	Wormald (Wellington)	Lawful Use	Accommodation Unit
Subcontractors	None	BWOF Expiry	30 Sep 23
Fire Contractor	WSP	Quick Link To....	<a href="#">BWOF Certificate</a>
Fire Region	<a href="#">NZ Fire Service Website</a>		
Brigade Connection	Yes (PFA#: 410239 - ADT)		
Fire Compliance Status	Due: 19 Jul 23		
Work Outstanding	Yes (4)		
Docs Available	103		
Entered into GSN	Imported from previous GSN		
	<a href="#">Fire Report</a>		
Asset Manager	Reon Hartley-House		
Housing Manager	CHRISTINE HANNAH		
Occupancy Status	No Data		

- 50202 **Display**
- [Inspection Table](#)
  - [Compliance Schedule](#)
  - [View Docs](#)
  - [Upload Documents](#)
  - [View Units](#)
  - [Work In Progress](#)
  - [Isolations](#)
  - [Archive This Building](#)
  - [Hold This Building](#)
  - [Edit This Data](#)
  - [Change F Comp Type](#)
  - [LBP Payments](#)
  - [False Alarms \(25\)](#)
  - [TA Comply Notices](#)
  - [BWOF Status](#)
  - [Show Street Map](#)
  - [Contractors](#)

### Installed Features: Inspection Table

[Back to Building Details](#)

[Legend of Symbols](#)

[Show Archived Features](#)

1 Jan 2023 to 31 Dec 2023

CPI: 50202  
DIXON STREET FLATS  
134 DIXON STREET  
LAMBTON, WELLINGTON

Schedule Anniversary Date [30 Sep](#)

		Insp Freq W F   Insp Freq M 3M 6M A   Insp Freq 2Y 3Y 4Y 5Y 12Y											
		← 2023 →											
Feature	Last Done	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
4512 Alarms	22 Jun 2023	✓	✓	✓	✓	✓	✓	★	★				
4512 Alarms	10 Nov 2022						★						
Access Control Doors	30 Jun 2022						★						
Access Control Doors	22 Jun 2023	✓	✓	✓	✓	✓	✓	★	★				
Auto Doors	28 Apr 2023		✓			★		★				★	
Auto Doors	24 May 2021						★						
BWOF	21 Oct 2022						★						
BWOF Verification	22 Jun 2023	✓	✓	✓	✓	✓	✓	★	★				
Emergency Lighting System	28 Apr 2023			✓							★		
Emergency Lighting System	22 Nov 2022						✓						
Evacuation Signs	24 May 2022						★						
Final Exits (Means of Escape)	22 Jun 2023	✓	✓	✓	✓	✓	✓	★	★				
Final Exits (Means of Escape)	24 May 2022						★						
Hand Held Fire Extinguisher x 5	22 Jun 2023	✓	✓	✓	✓	✓	✓	★	★				
Hand Held Fire Extinguisher x 5	06 Jul 2022						★						
Interfaced Fire / Smoke Doors	26 May 2023	✓	✓	✓	✓	✓	★	★					
Interfaced Fire / Smoke Doors	30 Jun 2022						★						
Lifts (Service Agent - Schindler Lifts M714)	28 Jun 2023						✓						

### Documents Available

[Back to Building Page](#)

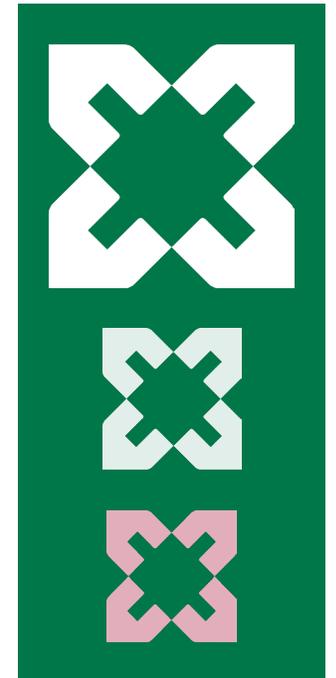
CPI: 50202  
DIXON STREET FLATS  
134 DIXON STREET  
LAMBTON, WELLINGTON

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<a href="#">122881</a>	CPI 50202 Dixon St, 134 Wellington Trial Evac Report.pdf	Evacuation Trial Report	28 Mar 23	<a href="#">Delete</a>
<a href="#">117637</a>	2022 - 50202 BWOF Memo 28.11.22.pdf	Correspondence	13 Dec 22	<a href="#">Delete</a>
<a href="#">117171</a>	Annual Survey 2022.pdf	Inspection Report	18 Nov 22	<a href="#">Delete</a>
<a href="#">117173</a>	2022 - 50202 Fire Alarm Annual Survey.pdf	Inspection Report	18 Nov 22	<a href="#">Delete</a>
<a href="#">115720</a>	2022 - 50202 (69735) BSSR & SSSR, 12As.pdf	BWOF	25 Oct 22	<a href="#">Delete</a>
<a href="#">111355</a>	Lift Form12a-2022 S2617.pdf	RIL/12A	29 Jul 22	<a href="#">Delete</a>
<a href="#">108017</a>	9a. 134 Dixon St Flats_CPI 50202_Trial Evac.pdf	Evacuation Trial Report	10 May 22	<a href="#">Delete</a>
<a href="#">104273</a>	Annual Survey 2021.pdf	Inspection Report	16 Dec 21	<a href="#">Delete</a>
<a href="#">100255</a>	2021 - 50202 (69735) BSSR & SSSR, 12As.pdf	BWOF	08 Oct 21	<a href="#">Delete</a>
<a href="#">99939</a>	Lift Form12a-2021.pdf	Annual Survey	15 Sep 21	<a href="#">Delete</a>
<a href="#">99867</a>	Shutdown Notice_859029_HNZ Flat 94 134 Dixon St. Welli.xls	Correspondence	09 Sep 21	<a href="#">Delete</a>
<a href="#">95422</a>	WSP - Evac Scheme 134 Dixon St Wellington.pdf	Evacuation Scheme	16 Jun 21	<a href="#">Delete</a>
<a href="#">95423</a>	EV-2021-510121-03-Approved.pdf	Procedure	16 Jun 21	<a href="#">Delete</a>
<a href="#">94094</a>	3. CPI 1417_95 Aro St_Aro St-Nairn St_WGTN_EvacForm_May2021.pdf	Evacuation Trial Report	26 May 21	<a href="#">Delete</a>
<a href="#">91445</a>	WSP143 Evac Scheme App Various Sites.pdf	CI	12 Apr 21	<a href="#">Delete</a>
<a href="#">89166</a>	50202 Annual Survey Jan 2021 for 2020 BWOF.pdf	Inspection Report	05 Feb 21	<a href="#">Delete</a>
<a href="#">85954</a>	3. Dixon St Flats_CPI 50202_Trial Evac. Form_Nov. 2020.pdf	Evacuation Trial Report	26 Nov 20	<a href="#">Delete</a>
<a href="#">85955</a>	3. 10 Kemp St_CPI 1176_Trial Evac. Form_Nov.20.pdf	Evacuation Trial Report	26 Nov 20	<a href="#">Delete</a>
<a href="#">85938</a>	3. Dixon St Flats_CPI 50202_Trial Evac. Form_Nov. 2020.pdf	Evacuation Trial Report	25 Nov 20	<a href="#">Delete</a>

# Equitable Evacuation in a social housing Context

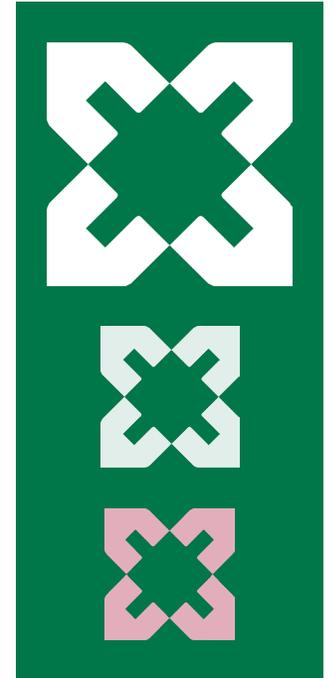
- In 2020 Kāinga Ora's Accessibility policy came into place
- The policy sets a commitment to ensure a higher percentage of our homes were to meet the range of accessibility needs of customers
- Tenancy and placement are crucial considerations
- Approach of housing persons, requiring assistance, on the ground floor of high rises is not sustainable and not often appropriate

Standard	Full Universal Design (FUD)	Accessible
Homes that meet our 'typical' requirements and include some universal design features but – for a range of reasons – cannot meet FUD requirements	Homes considered to be more liveable for the entire population and are – or can be made to be – fit-for-purpose for <b>most</b> customers.  These homes include all universal design features seen in 'standard' homes.	Include all features of universal design seen in FUD homes but go <i>above and beyond</i> those requirements to support customers living with a disability



## Equitable Evacuation in a social housing Context

- Where Kāinga Ora houses “Persons that require particular assistance” this becomes a challenge in a social housing context in that meeting obligations, in terms of using purpose built evacuation equipment such as stair chairs, is not a feasible or workable option. Use of such equipment requires:
  - regular training of building occupants
  - the equipment would need to be in situ
  - other building occupants (customers) would be required to use the equipment provided to evacuate their fellow customers from the building
- The above approach can be demonstrated in private apartment blocks where dedicated and reliable fire wardens are trained, but in a social housing context this cannot be proved to be an effective or reliable approach
- Traditionally Kāinga Ora would house “persons requiring particular assistance” on the ground floor of what we deem a complex. This approach no longer applies for current designs where fully accessible or full universal designs are proposed
- As a policy position Kāinga Ora require evacuation schemes for all relevant buildings, even if a sprinkler exemption is permissible, noting that commercial or office space in a building would preclude the potential for a sprinkler exemption to be used
- Training requirements
- FENZ encountering issues of social cohesion
- False alarms and tying up of FENZ resources, appropriate active system selection and specification



## Innovation – Pushing boundaries

Since joining Kāinga Ora I have had the opportunity to be involved in some innovative and satisfying pieces of work.

- Managed 3 Major contract transitions and start ups during lockdowns, including onboarding suppliers
- Managed to maintain overdue BWOFF within the portfolio to unprecedented low levels consistently, even through Covid and natural disasters.
- Contributing to and implementing an Organisation Fire Safety Policy
- Residential Sprinkler Pilot in association with FENZ (NZS4517 Systems)
- Managed to get the first lifts for fire evacuation approved (3) Buildings in a development under construction
- Involved with 3 further High rise projects where Evacuation lifts are proposed.
- Had the opportunity to collaborate with regulators, FENZ and MBIE



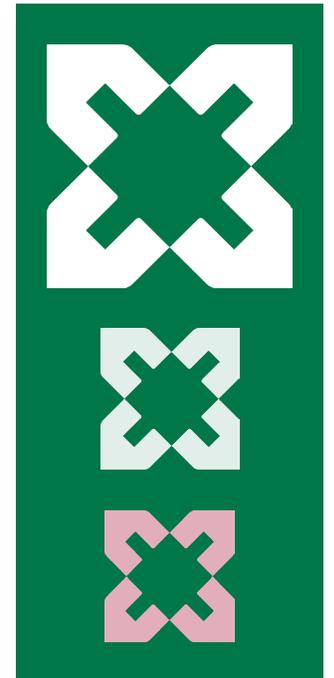
# Arlington

## Disclaimer:

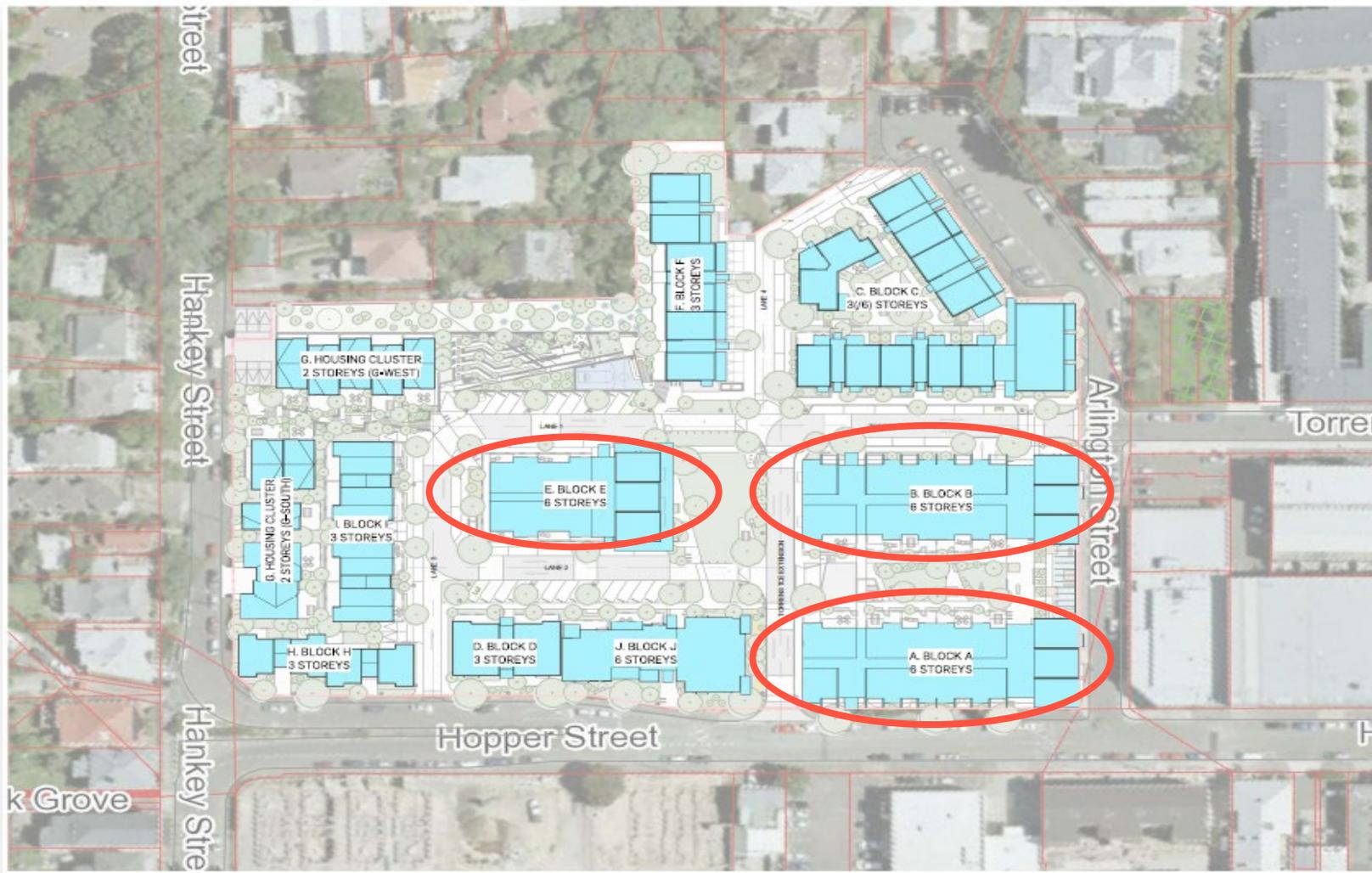
The approach used for this project is not “The Answer” for providing Equitable Evacuation it is a bespoke solution specific to this project, and the challenges of social housing and managing Kāinga Ora evacuation obligations and meeting Kāinga Ora obligations under regulations.

## The Development

- Arlington is the redevelopment of an entire city block, formerly social housing which was part of WCC social housing portfolio
- Multiple building configurations involved in development of 3 story walk ups to apartment complexes
- 3 Building will have lifts for evacuation
- 6 Storey with a universal design aspect to provide customers with accessible needs.



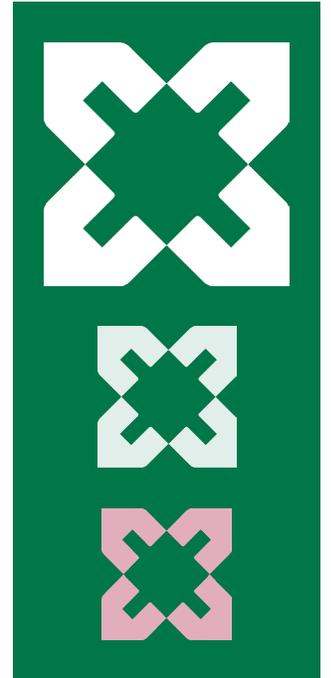




# Arlington

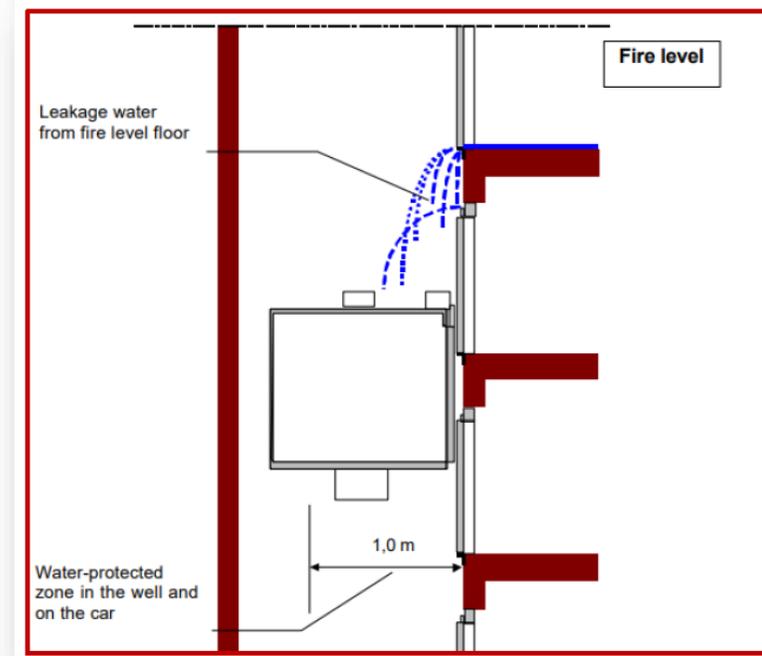
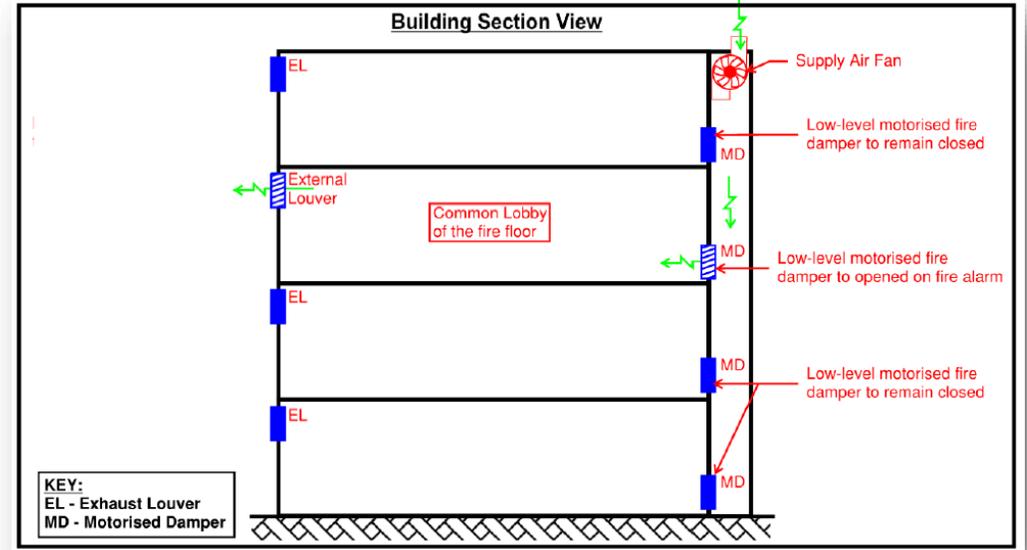
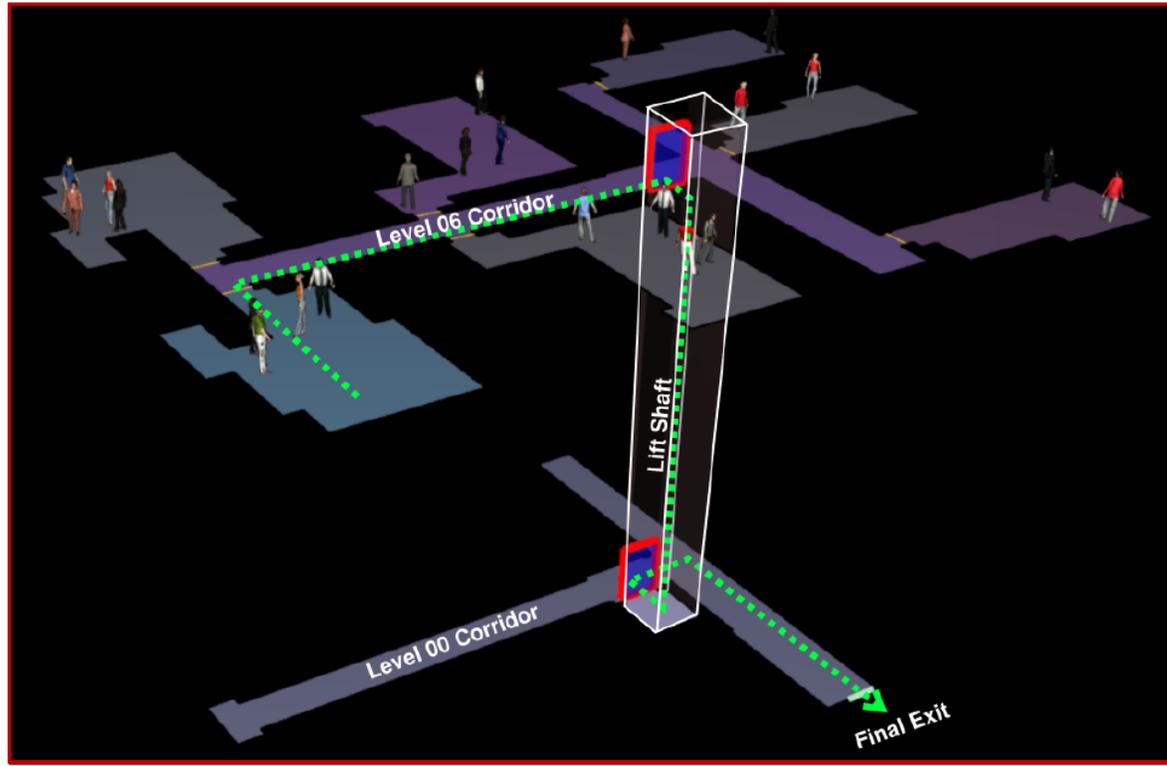
## The Process with Arlington

- The current Arlington project involved a collaborative approach, between the Kāinga Ora Compliance team, FENZ and the design team, to enable FENZ to be comfortable with the proposed approach for the use of lifts for evacuation; this was the first (and still is the only) project in which lifts for evacuation has been approved in New Zealand
- Essentially a FEB process outside the consent process
- To enable this approach to be accepted concerted consultation occurred between the fire engineers, FENZ (both fire safety and the Engineering team) and the Kāinga Ora compliance team. A final acceptable design was approved after a period of months in develop and several iterations
- The Buildings involved designs fully complied with C/AS2
- The Approach used was not about the Building code it was about going beyond the minimum and proving tenability with extensive modeling needed to provide FENZ with an appropriate level of comfort



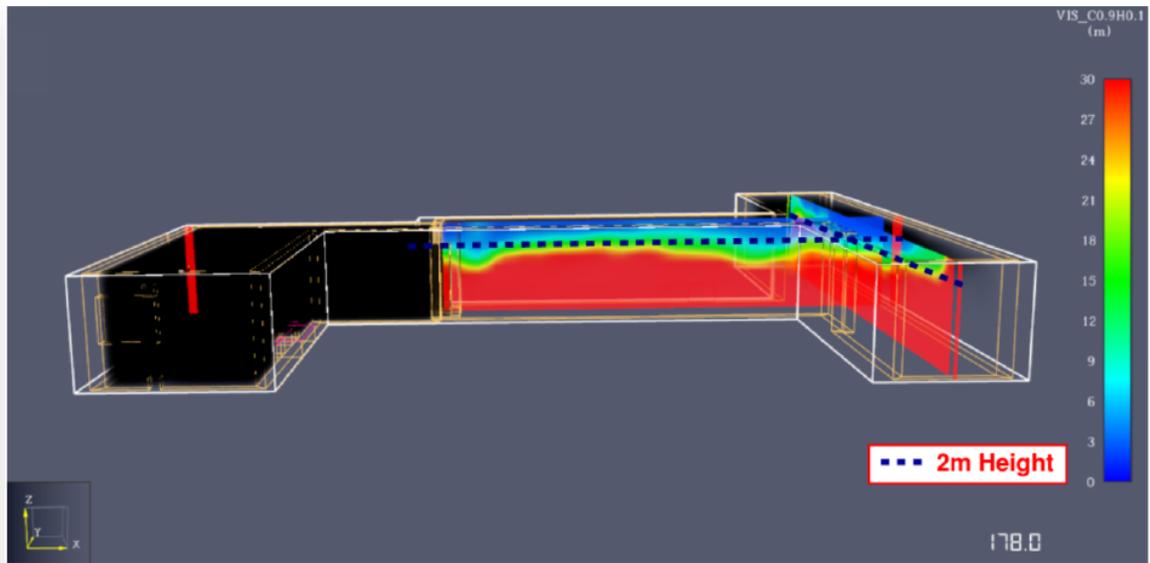
# Arlington

## The Design and Considerations

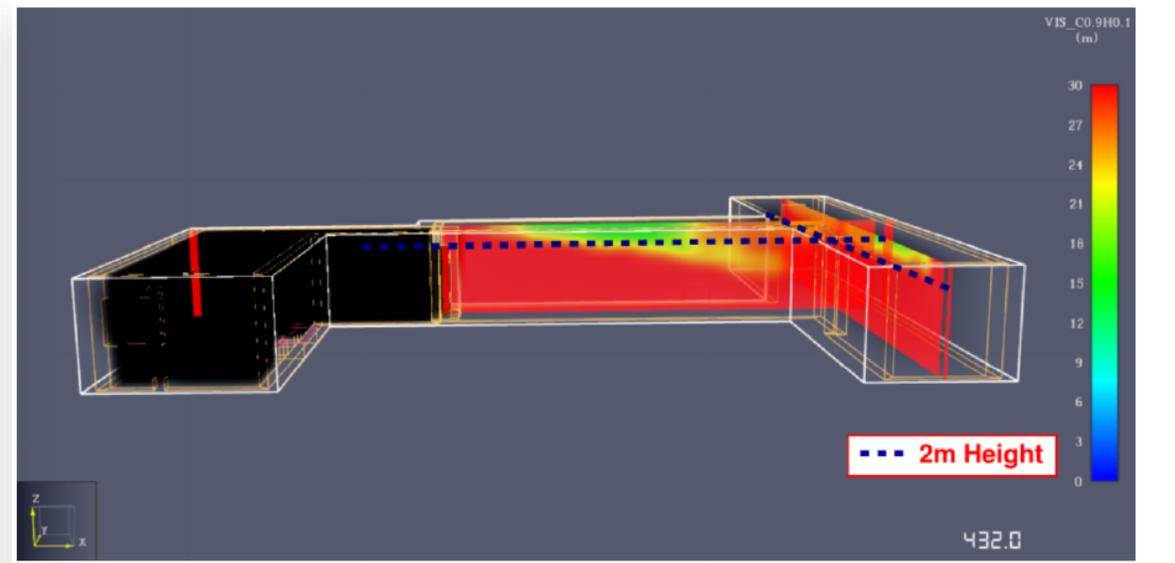


# Arlington

## The Design and Considerations



After the door is open for 15 seconds, the lobby is full of smoke. The supply air activates after the sprinkler activation + 30 sec (delay) + 30 sec (ramp-up time)

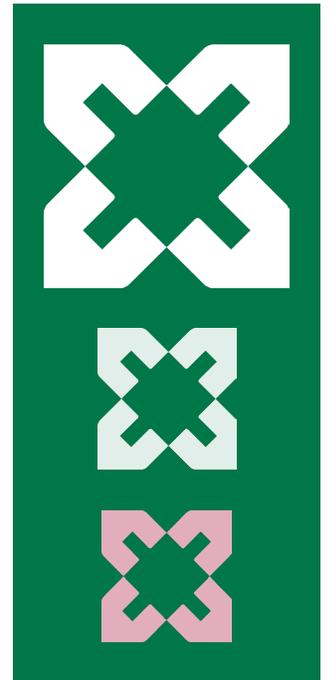


By the time the remote occupants enter the lobby most of the smoke is cleared up with some minor areas where the visibility is approximately 18m at 2m height.

## Ongoing Compliance requirements and considerations

Adoption of approach - additional considerations and requirements to provide for persons requiring assistance:

- Training
- Tenancy Management
- On boarding and Management of the tenancy
- Inclusion as a compliance schedule item? Creation of a new sub category of specified system?
- On going inspection requirements
- Lift Outage – Does the build still comply with its evacuation scheme.. (Consequences)
- Passive Inspections
- Interfaces
- End to end testing – Does it need to be its own specified system



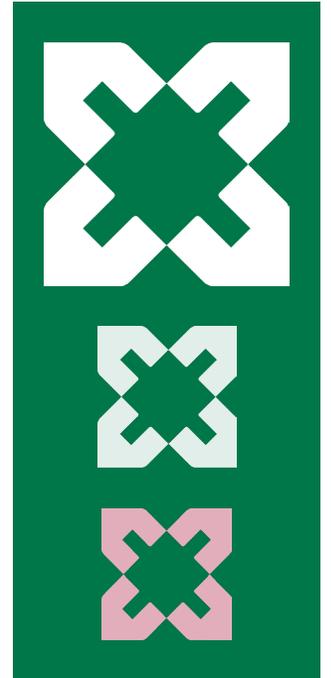
## In Closing

In enjoy my job, what my team and are compliance partners achieve – its not always easy

Everyone in this room is here because they are passionate about compliance and life safety, we don't always have to agree but it's a common shared morally right goal.

Consistency and raising the collective bar across all aspects of this industry is needed, that's not one partys job it needs to a collective effort from all.

Recent tragic events have highlighted the importance of what we do lets all be diligent in our roles.



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