

Housing Overview and Scrutiny Committee



SOUTH
KESTEVEN
DISTRICT
COUNCIL



Thursday, 21 September 2023 at 3.00 pm
Council Chamber - South Kesteven House,
St. Peter's Hill, Grantham. NG31 6PZ

Committee

Members: Councillor Virginia Moran (Chairman)
Councillor Lee Steptoe (Vice-Chairman)

Councillor Emma Baker, Councillor Anna Kelly, Councillor Zoe Lane, Councillor Penny Milnes, Councillor Habibur Rahman, Councillor Jane Wood and Councillor Paul Wood

Please note start time

Agenda

This meeting can be watched as a live stream, or at a later date, [via the SKDC Public-I Channel](#)

1. Public Speaking

The Council welcomes engagement from members of the public. To speak at this meeting please register no later than 24 hours prior to the date of the meeting via democracy@southkesteven.gov.uk

2. Apologies for absence

3. Disclosure of Interest

Members are asked to disclose any interests in matters for consideration at the meeting.

4. Minutes of the meeting held on 13 July 2023 (Pages 3 - 15)

5. Announcements or updates from the Leader of the Council, Cabinet Members or the Head of Paid Service

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01476 406080

Karen Bradford, Chief Executive
www.southkesteven.gov.uk

6. **Regulatory Compliance update** (Pages 17 - 73)
To update the Committee on actions to ensure regulatory compliance of the Council's social housing landlord function following the non-compliance notice issued by the Regulator of Social Housing.

7. **HRA Capital Programme - Progress Monitoring** (Pages 75 - 79)
To update the committee on the progress of the HRA Capital Programme, providing an overview of current and projected spend along with delivery updates on all associated programmes.

8. **Earlesfield Programme update** (Pages 81 - 91)
To update the committee on the progress of the Earlesfield Project, providing an overview of the project position, completed works and projected timescales.

9. **Update following Void Workshop (Future workshops)** (Pages 93 - 123)
To update the committee on the recent voids workshop and the future plans.

10. **Fee Policy Licensing of Mobile Homes** (Pages 125 - 136)
The Council is required to publish a policy if it is to charge for the licensing of mobile home and caravan sites. The Council has an existing policy and the fees are reviewed on an annual basis to set the fees for the next financial year.

11. **HRA Disposal & Acquisitions Policy** (Pages 137 - 152)
To inform the Committee of the new HRA Acquisition and Disposal Policy which sets the framework for the way in which we acquire and dispose of land or assets to and from the Housing Revenue Account.

12. **Work Programme 2023/24** (Pages 153 - 154)

13. **Any other business which the Chairman, by reason of special circumstances, decides is urgent**

Meeting of the Housing Overview and Scrutiny Committee

Thursday, 13 July 2023, 10.00 am



SOUTH
KESTEVEN
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Committee Members present

Councillor Virginia Moran (Chairman)
Councillor Lee Steptoe (Vice-Chairman)
Councillor Anna Kelly
Councillor Zoe Lane
Councillor Habibur Rahman
Councillor Jane Wood
Councillor Paul Wood
Councillor Charmaine Morgan
Councillor Graham Jeal

Other Members present

Councillor Tim Harrison
Councillor Bridget Ley
Councillor Ian Selby
Councillor Mark Whittington

Cabinet Members

Councillor Ashley Baxter, Deputy Leader of the Council
Councillor Phil Dilks, Cabinet Member Housing and Planning
Councillor Rhea Rayside, Cabinet Member for People and Communities

Officers

Craig Spence, Acting Director of Housing
Graham Watts, Assistant Director of Governance and Monitoring Officer
Jodie Archer, Head of Housing
Julie Martin, Head of Technical Services
Debbie Roberts, Head of Projects, Policy and Performance
Sarah McQueen, Housing Options Manager
Lucy Bonshor, Democratic Officer

1. Public Speaking

An email had been received from a Miss Lisa Freeman requesting to speak on homelessness, the environment as a rough sleeper and the effects of unwarranted intervention of 3rd parties. However, Miss Freeman was not present at the start of the meeting and it was agreed to continue with the agenda and take a decision on whether or not to allow Miss Freeman to speak if/when she arrived.

Miss Freeman arrived at 11:00am and was given the opportunity to speak.

Miss Freeman stated that she lived in a tent near the public toilets in Welby Gardens and stated that not one of the Committee had recognised her which she felt was bad as the Committee dealt with housing. She had been rough sleeping for 33 days. She had moved to Grantham recently due to personal circumstances from Peterborough where she had lived her whole life. She was 52 years old and it had taken a lot for her to move from Peterborough to a new area, but it had been due personal issues and she felt that she was being bullied and harassed by services in Peterborough. She had visited Grantham several months ago, felt that it was a lovely place and moved here for a fresh start, as she couldn't take any further action where she had lived. She had informed the services what she had planned to do and was informed that she would need a local connection, if she didn't have one to move here, they would see what they could do.

The last 38 days had been the most traumatic of her life. She was offered assistance for a small amount of time and put in a hotel in Gonerby and she was under the impression that she would be given temporary relief, a hostel or another place. The accommodation only lasted a week and then she was put back on the streets by the Council and she felt that the Council had made her intentionally homeless after offering assistance. She had been sleeping rough for 33 days, she had engaged with all services, she had to do all the work to provide information to the Council, she was not an officer she didn't get paid and she felt she had been bullied and harassed by people as they didn't want to assist her for whatever reason.

NACRO had offered her a place and various other organisations had offered her a place, she had visited Lincoln and Newark and they too had offered her a place. She stated that someone within South Kesteven had advised these places not to assist her as there was an open case here. They had referred her back to the town where she was from, even though she was escaping domestic violence.

She had been on the street 30 days, she had no drink or drug issues, she was well spoken and professional. She didn't believe that the services were up to date with current housing laws and the homelessness reduction act and the various other processes and procedures and she thought that they needed to be looked at.

The Chairman stated that Miss Freeman's comments had been noted and referred to the meeting that had been arranged at the end of the Housing OSC or at lunchtime with Senior Officers of the Council where the Chairman was confident that everything would be resolved and that she would receive updates following the meeting.

2. Apologies for absence

Apologies for absence were received from Councillor Emma Baker and Councillor Penny Milnes and these Members were substituted by Councillor Charmaine Morgan and Councillor Graham Jeal.

3. Disclosure of Interest

None disclosed.

4. Announcements or updates from the Leader of the Council, Cabinet Members or the Head of Paid Service

There were no announcements or updates.

5. Housing Regulatory Compliance Update

The Chairman expressed her admiration for the phenomenal work that had been carried out to get to the current position and she thanked all those involved for their work. She acknowledged that being in special measures was a process and that it had to be monitored even when you were at the high level that the Council was currently.

In introducing the report, the new Cabinet Member for Housing and Planning stated that he was delighted that there was a dedicated Overview and Scrutiny Committee for Housing. He made a commitment to working together with all those present to deliver the basic requirement of a decent home for those who were in most need whatever challenges the Council faced. He made reference to the national housing crisis and the challenges that were being faced including record inflation, rising interest rates and rising mortgage rates. Reference was made to the local backlog in fitting kitchens, bathrooms and central heating and the current high turnaround period for void properties.

The first report before the Committee updated Members on the actions taken to ensure regulatory compliance of the Council's Social Housing Landlord function. The Council was a social housing landlord to almost 6,000 properties and was one of the largest local authority providers of housing across the East Midlands.

The Council had been in special measures since 2021 when it self-referred itself to the Regulator of Social Housing for its failure to comply with a range of legally required safety checks to protect its tenants with year on year failures in respect of gas, electricity and fire prevention measures.

Since February 2021 necessary actions had been taken following guidance from the Regulator of Social Housing. The current compliance requirements were very close to reaching their goal and many of the actions and improvements were reported to tenants via the SKyline magazine a copy of which was appended to the report at Appendix 3. The Cabinet Member for Housing and Planning was confident that the Council would soon be coming out of the special measures and that the housing service would be fit for purpose which hadn't been the case two years ago.

The Acting Director of Housing referred Members to appendix 1 of the report which listed the KPI's current position as at the end of May 2023. Legionella, asbestos

(re-inspections), Fire Risk Assessments and Lift Inspections were all at 100%, gas inspections were at 99.3% and electricity was at 90.29%, with Smoke and CO at 99.76% (14 properties outstanding) and Damp and Mould at 99.80% (12 properties still in need of work), there were still some issues with gaining access to some properties.

Members thanked everyone for the work involved to date and asked when full compliance would be achieved and the Council would come out of special measures. The Chairman stated that an audit had been undertaken and there were still a few minor matters that needed addressing but it was estimated that in two to three months the Council would be as close as it could be to 100% compliance.

Questions were then asked about the KPI's in relation to the smoke detectors and the figures shown and a question that was asked at a recent Governance and Audit Committee and how long-standing repairs were managed to which the Acting Director of Housing replied and referred to the new housing management system and aligning it to the repairs system.

Further comments were made about policies and political decisions to which the Acting Director of Housing stated that there were a number of policies that needed a refresh, there were 34 across the housing directorate and due process had to be given to each, which was why the allocations and repairs policy had been brought before the Committee.

Further comments were made about the achievements that had been made over the last two years and the amount of work that had been done by Officers and Members to reach the current position.

Reference was made to the SKyline magazine and its informative content which it was felt would benefit private tenants also. It was stated that some of the key pages were reproduced in SK Today. The Deputy Leader of the Council referred to SK Today which was now produced on-line and hard copies were no longer delivered, therefore reducing costs, although the bin schedule would still be circulated each year.

Members noted the latest compliance position following the ongoing meetings with the Regulator of Social Housing and that the Committee received a further update report at its next scheduled meeting.

➤ **Action**

That the Committee receive a further Housing Regulatory Compliance update at its next scheduled meeting.

6. Housing Repairs & Maintenance Policy

The Cabinet Member for Housing and Planning presented the report which concerned the new Housing Repairs and Maintenance Policy which laid out the

responsibilities of the Council as a landlord and also the responsibilities and expectations of tenants in respect of housing repairs and maintenance to the housing stock of the Council.

The draft document had been compiled following the work carried out with the Social Housing Regulator to improve engagement with tenants. The document was part of a consultation process and a framework for delivering repairs and maintenance. The document also included key performance targets and at page 67, Appendix 2, there was a specific proposed Damp and Mould Protocol.

The Head of Technical Services stated that the document set out a framework for the delivery of repairs and maintenance within the repairs team and covered both responsive repairs and also capital improvements as well as cyclical work such as painting and decorating and some of the compliance activities. Previously the information had been available in a set of separate protocols and the proposed policy brought all those protocols into a transparent framework which tenants would be consulted on.

It was acknowledged that a lot of the work was reliant on the implementation of the IHMS system to enable data led decisions to be made and also the ongoing monitoring of KPIs.

The framework made clear the expectations of both the Council as a landlord and what was expected of tenants. The separate Damp and Mould protocol had been compiled following the recent report from the Social Housing Regulator and to make transparent what the Council's responses would be to significant damp and mould cases.

The Housing Team were congratulated on compiling the document before the Committee.

Comments were made in respect of

- the Damp and Mould protocol with concern being expressed in respect of investigations into damp and mould and tenant's intervention which may impede an investigation and how this would be managed.
- Fencing repairs and potential safety concerns especially where tenants were elderly or vulnerable.
- Security was raised in relation to smoke and carbon dioxide detectors and accessibility when changing batteries.
- Issues with faulty fobs for gaining entrance in communal accommodation

A question was asked in respect of changes to the documents content and best practice from other local authorities. It was stated that the format had been changed for clarity, so that it was clear what was expected of tenants.

Members acknowledged the work that had gone in to compiling the document and asked how regularly the policy would be reviewed, refreshed and revised.

It was stated that the policy was a key document and communication in respect of the document with tenants was very important and various consultation routes were being put in place. There would be an on-line consultation as well as a telephone message reminding people that the document was out for consultation. It was also proposed to create a north and south focus group to try and engage with as many tenants as possible.

Documents were routinely reviewed in respect of changes required by legislation and the report by the Social Housing Regulator had prompted the Damp and Mould review and to keep it as a separate protocol document. It was suggested that a communication strategy was worked up in respect of documents and that they were reviewed at least once every four years.

The Cabinet Member for Housing and Planning welcomed the comments made by Members and stated that policies were reviewed regularly due to the nature of the housing sector. Reference was made to the national scene and the tragedy that had occurred in the Northwest which had made a review of the Damp and Mould Protocol timely.

Further comments were made about the amount of information within the document and how it was presented to people making sure that the important information was highlighted. An amendment was proposed to the second recommendation within the report to include the Cabinet Member for Housing so that the recommendation read:

That the Committee recommends that the Director of Housing in conjunction with the Cabinet Member for Housing make alterations and amendments to the Policy to incorporate comments arising from consultation, for submission and adoption at full Council.

The amendment was seconded.

(10:55am Councillor Whittington left the meeting and did not return)

The Acting Director of Housing stated that a communication strategy was being undertaken to enable effective consultation and he hoped to be able to circulate it to the Committee within the next four weeks.

Further comments were made about the format of the Communication Strategy and that it would need to be available in a variety of formats and also the right to repair and what was classed as a priority, with an example being given of a failure to repair. It was stated that response time was usually one day but it was difficult to set a timeframe.

As the amendment had been proposed and seconded the Chairman read out both recommendations with the amendment. On being put to the vote they were **AGREED**.

Recommendation

- 1. *That the Committee notes the Housing Repairs and Maintenance Policy and that it is in line with best practice and will ensure clear operational guidance for staff and all customers.***

- 2. *That the Committee recommends that the Director of Housing in conjunction with the Cabinet Member for Housing make alterations and amendments to the Policy to incorporate comments arising from consultation, for submission and adoption at full Council.***

- 7. *Housing Pipeline update***

The Cabinet Member for Housing and Planning presented the report which provided an update on the HRA new build pipeline programme. The Capital Programme for 2023/24 Housing Development investment had been established at £4.5m and would fund the construction of 20 apartments at Swinegate, Grantham and four one bed flats at Elizabeth Road, Stamford, both schemes were due to start in the autumn of 2023. Further schemes were also referenced including a 21 unit development at Larch Close, Grantham due to start in June 2024 and a scheme at Wellington Way, Market Deeping for 14 units, date to be confirmed. The complexities involved with developing smaller garage sites was recognised and the costs these incurred, also buying back Right to Buy sales may be seen as counter intuitive but they could be the most cost-effective option.

The Head of Corporate Projects, Policy and Performance reiterated that the report was an update on the housing pipeline programme. Cabinet had recently approved the start of the Elizabeth Road project and contracts would soon be exchanged. The Larch Close development was with Planning and there were slight amendments to be made to the development before the application was resubmitted. Feasibility work was currently being undertaken in respect of the Wellington Way site at Market Deeping together with a few other sites that had been brought forward.

A question was asked about the Larch Close site with reference being made to local opposition when the scheme had first been proposed some years ago and the loss of green space. What percentage of land was being taken up by the new scheme. It was confirmed that the original scheme was wider than the current proposed scheme which was a far smaller development. The Head of Projects, Policy and Performance stated that she didn't have the information to hand but would forward it on to Councillor Steptoe who was one of the Ward Members for the area in due course.

➤Action

Information on the size for the Larch Close, Grantham site to be forwarded to Councillor Steptoe in due course.

Concern was expressed by one Member about sites that had been marked for development and the loss of green space, where could Members see what sites were being brought forward. Reference was made to the sites allocated within the Local Plan and land owned by the Council such as old garage sites. The Cabinet Member for Housing and Planning assured the Committee that when plans for new builds were known they would be brought before the Committee. It was suggested that the item be added as a substantive agenda item.

Questions were asked about land and development, specifically employment land in Bourne and a recent high profile bankruptcy involving a development in Grantham. One Member asked about how more homes would be delivered especially in light of the rise in homelessness and the lack of housing stock. The Cabinet Member for Housing and Planning stated that this was a critical question and referred to the current situation in respect of housing stock which was currently void due to requiring major works. It was a huge challenge and although new properties were being built where they could be, developing smaller sites was expensive, although changes meant that Right to Buy sales could be reinvested, it was a matter of priority and balance. It was felt by certain Members that a housing strategy was needed to give real structure to housing before the end of 2023. The Acting Director of Housing stated that the Housing Strategy was being revised and a draft would come before the Housing OSC before the end of the calendar year.

Further questions were asked about the costs stated, £4.2m in 2023/24 and only £2.8m in 2024/25. It was stated that due to the late commencement of the schemes underspends had occurred and these would necessitate carry overs, but Officers were confident that the schemes would come in on budget.

A further question was asked about multi occupancy houses for people with special needs and the challenges this involved. It was stressed that this was more for the private sector but the Acting Director of Housing would speak to the Member outside of the meeting.

Members noted the updated report.

8. Key Performance Indicators

The Head of Policy, Projects and Performance presented the report which outlined the Council's performance against the Corporate Plan Key Performance Indicators (KPIs) for the year 2022/23. The information contained within the report was up to 31 March 2023.

Information on the KPI's was presented twice a year. A further review of actions was due to take place with the Quarter 2 report and it was noted that 2023/24 was the final monitoring year for these specific KPIs, all Members would have the opportunity to engage in the new Corporate Plan when it was discussed.

Appendix A to the report outlined the overall performance against the original actions which came within the remit of the Committee. Currently there were 9 actions, 5 actions were rated Green, 2 amber and 2 red.

Paragraphs 2.8 – 2.15 of the report gave background information on the actions.

One Member asked a question in relation to the homelessness case figure which seemed to be getting worse. It was stated that people presenting as homeless had increased and they had a lot more complex needs. Proactive work was being undertaken to ensure that rough sleepers had a sustainable option for the future with significant work being done with other partners within Lincolnshire.

A question was asked about whether South Kesteven was the lead on homelessness and it was confirmed that South Kesteven hosted the Rough Sleeper Initiative funded Change4Lincs initiative with North Kesteven, South Holland and West Lindsey. When presented as homelessness South Kesteven had a duty to assess the person in respect of any local connections to South Kesteven or other areas such as Peterborough or Lincoln and work with that local authority.

A further question was asked about those fleeing domestic violence and it was stated that South Kesteven had adopted a Domestic Abuse Policy last year. There was a national scheme for refuge accommodation across the country and for those wanting to relocate there were powers and tools to take the best action. Partnership working was key to enable the best option to be taken forward for those fleeing domestic violence.

A further comment was made on the potential for an increase of those presenting as homeless and how this would be managed to which the Head of Housing replied.

Reference was made to the solid fuel heating still in place in some council properties and how soon these would be replaced. The Council had been successful with the Social Housing Decarbonisation Fund and there was a two-year programme currently in place to hopefully replace solid fuel heating by 2025.

The Cabinet Member for Housing and Planning stated that reducing solid fuel heating in homes was a legacy issue which would be addressed as quickly as possible. He made reference to the national housing crisis which was being exacerbated by the cost-of- living crisis, record mortgage interest rates and the effects on the rental market which was causing a major problem in the housing sector.

Members noted the report.

(The meeting adjourned between 11:45 and 12:05)

(11:45 Councillor Graham Jeal left the meeting and did not return)

9. Voids Performance and update

The Cabinet Member for Housing and Planning presented the report which updated members on the progress of the Council's void properties, the changes in the process in the past year and current performance measures.

On average there were 370 void properties each year which meant that no rental income was being received for these properties whilst void. Where possible properties were let to the right applicant as soon as possible to minimise the loss of rental income. Getting voids back into the rental system was a huge challenge with current void turn arounds taking in excess of 100 days. The KPI was sub 60 days with industry best practice being 40 days or less. Challenges included a national labour shortage in certain trades plus supply chain issues.

Following a restructure of the Housing Directorate, focus was placed on the requirements of the void team. Voids were split between minor and major works and unfortunately a higher proportion of the properties coming back as voids were in need of major works.

Historically there had been around 20/25% of voids requiring major works, recently the figure was upwards of 55/60% of properties that required major works.

The Acting Director of Housing drew Members attention to the void period when one tenancy ended and another began and the procedures required and the number of resources needed. The Housing Teams management of voids was proactive and he referred Members to Appendix 4 of the report which gave a snapshot of voids during 2022/23 and the mapping of properties.

Concern was expressed by Members about the number of voids requiring major work and it was stated that this in some part was due to a lack of historical capital investment, the neglect of properties by tenants and problems with supply chains for the supply of goods such as kitchens. More proactive work was being done with pre-termination inspections and in the planning of the works with data led decisions being made to try and reduce the numbers.

A comment was made about recharging tenants who had not looked after a property. Previously it was stated that recharging had not been enforced with regularity as tenants had left properties and the landlord had limited means of contacting them. Changes that were being put in place gave the tenant more empowerment and ownership of a property with work being completed to a higher standard.

Further concern was expressed about the extensive turnaround of properties and a proposal was put forward:

That the Committee recommended that the Cabinet discuss the issue of voids with senior officers to try and suggest a way forward to address the problem and reduce the turnaround of properties to 60 days.

The proposal was seconded.

Further discussion followed with the Acting Director of Housing stating that revised procedures had been implemented and a new structure and robust processes had been put in place so that voids currently had the highest priority. One Member referred to how the work was undertaken on the void properties, were people employed by the Council or sub-contracted and could South Kesteven's apprenticeship scheme be used to help "grow" capacity.

The Chairman proposed that a workshop be arranged with the Housing Committee Members to discuss voids and to try and seek a way forward.

A question was asked about those people who were currently at the Urban Hotel in Grantham to which the Head of Housing responded that this was in relation to the migration crisis and there was full wrap around support in place.

Further comments were made about the "trashing" of properties and examples given and how these people should not be allowed further properties. More comments followed in respect of the turnaround times and what was required when a tenant left a property. It was acknowledged that the void turnaround times were a challenge.

The proposal put forward that the Committee recommended that the Cabinet discuss the issue of voids with Senior Officers to try and suggest a way forward to address the problem and reduce the turnaround of properties to 60 days was voted on and was **LOST**.

The recommendations contained within the report were then proposed with the addition that a workshop be arranged to discuss voids with Members of the Housing OSC and any other Member with an interest.

Recommendation:

1. ***That the Committee notes the performance for 2022/23 regarding void properties.***
2. ***That the Committee recommends future reporting on voids to be quarterly, advising on the progress and the performance measures being met.***
3. ***That a workshop be arranged to discuss voids with the Housing OSC and any other Members who were interested in the topic be invited to attend.***

(Workshop to be arranged before the next meeting of the OSC)

10. Housing Allocations Policy

The Cabinet Member for Housing and Planning presented the report which updated Members on the progress of the Council's allocation policy which had been adopted in July 2022. Since the current policy had been adopted it had become clear that further changes were required following the proposed introduction of a Choice Based Lettings service. The report and associated appendices detailed the proposed changes to satisfy the allocation of housing stock utilising a Choice Based Lettings approach.

All those currently on the Housing Register would be required to re-register between the period 28 of August 2023 to the 25 September of 2023, with the new system due to go-live from the 23 of October 2023. The re-registration request would be a validation of the current Housing Register list as to what people's needs were as these changed over time. Choice Based Lettings was a tried and tested method for a fairer and more transparent allocations process system which had been widely used across the social housing sector.

The Head of Housing stated that following the adoption of the policy in July 2022, it had felt prudent to bring the proposed changes back to Committee for complete transparency in relation to the proposed changes and Choice Based Lettings which was due to go live from the end of October 2023. A strong communication drive would be implemented in respect of the need to re-register for all the Council's tenants and those in the private sector wishing to go on to the Housing Register. The Communication drive would start from the date of the meeting. All people currently on the Housing Register would be written to with clear information on how they could access support should they have any difficulties around re-registration. Events would be attended in four market towns to give advice and guidance about re-registering.

The new Choice Based Lettings system would give transparency about what properties were available on a daily basis and on re-registering there would be a clear focus on housing need. The current six bands would be reduced to four bands.

Members welcomed the change to a Choice Based Lettings system and congratulated Officers on their work to date. Concern was expressed by some Members about the "faceless" people at Grantham and that for those who lived outside of the Grantham area there was no face-to-face contact and that perhaps one day a week Officers could work from community hubs in specific towns such as Bourne. Another Member was concerned about engagement with those who had learning difficulties or lacked communication skills, it was felt that these people may lose out. It was stated that Officers were aware that there were a number of people with special needs and triggers were in place to highlight these individuals.

It was reiterated that re-registering was a validation of housing need within the district in a fair and transparent way, and whether people still wished to be on the Housing Register.

One Member questioned about those people registering between the dates or they had not read about the deadline. The Housing Options Manager stated that these would be looked at and honoured where a valid reason could be supplied.

A further question was asked in relation to auto bid, band 1 and homeless persons to which the Housing Options Manager replied that each case would be dealt with on a case-by-case basis.

The Committee noted the proposed changes to the Allocations Policy and the current position and timeline for implementation of the Choice Based Lettings system and it was recommended that a future update on Choice Based Lettings would come back to the Committee prior to the system going live in October 2023.

➤ **Action**

That an update on Choice Based lettings to come back to the Committee prior to the system going live in October 2023.

11. Work Programme 2023/24

The following items were to be added to the Work Programme:

- Progress report following the proposed Void workshop
- HRA Capital Programme – progress monitoring report

12. Any other business which the Chairman, by reason of special circumstances, decides is urgent

None.

13. Close of meeting

The meeting closed at 1:09pm.

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SOUTH
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Housing Overview and Scrutiny Committee

21 September 2023

Report of: Councillor Phil Dilks
Cabinet Member for Housing and
Planning

Housing Regulatory Compliance Update

Report Author

Craig Spence, Acting Director of Housing



craig.spence@southkesteven.gov.uk

This report seeks to update Committee on actions to ensure regulatory compliance of the Council's social housing landlord function following the non-compliance notice issued by the Regulator of Social Housing.

Recommendations

That Committee:

1. That the Committee notes the latest compliance position following the ongoing meetings with the Regulator of Social Housing.
2. That the Committee receives a further update report at its next scheduled meeting.

Decision Information

Does the report contain any exempt or confidential information not for publication?	No
What are the relevant corporate priorities?	Housing that meets the needs of all residents
Which wards are impacted?	All

1. Implications

Taking into consideration implications relating to finance and procurement, legal and governance, risk and mitigation, health and safety, diversity and inclusion, staffing, community safety, mental health and wellbeing and the impact on the Council's declaration of a climate change emergency, the following implications have been identified:

Finance and Procurement

- 1.1 The financial considerations arising from the compliance requirements have been incorporated in the HRA budgets presented and approved by Council on 1 March 2023.

Completed by: Alison Hall-Wright, Assistant Director of Finance and Deputy S151 Officer

Legal and Governance

- 1.2 This compliance update provides Members with an opportunity to track and consider progress against key risk areas, which is to be welcomed from a governance perspective. The legal implications for non-compliance are incorporated within the risk ratings.

Completed by: Graham Watts, Assistant Director of Governance and Monitoring Officer

Risk and Mitigation

- 1.3 The necessary risk issues, logs, and mitigations will be identified through the necessary work plans, and any work outputs agreed with the Regulator. Clearly dealing with significant compliance matters requires a comprehensive approach to risk management, particularly in respect of assessing priorities and critical actions. The necessary and agreed risk assessment process will be discussed

and agreed with the Regulator at the appropriate time to ensure outcomes are as far as possible managed and objectives achieved.

Health and Safety

- 1.4 The key focus in meeting the regulatory standard is to ensure tenants, leaseholders, their households and visitors live in homes that are, as far as is reasonably practicable, safe with hazards minimised. This is reflected in the key compliance areas that are monitored and reported to Committee.

Diversity and Inclusion

- 1.5 All the necessary safeguarding and equality issues will be identified and complied with as the necessary compliance and improvement activities take place. Each equality and safeguarding impact are carefully considered when actioning a compliance or regulatory change. This is especially so when managing such matters for vulnerable households and particularly those occupying specialist accommodation such as designated sheltered accommodation.

Climate Change

- 1.6 Any capital improvement plans especially in the context of dealing with essential gas, electrical and other works will aim to maximise energy efficiency measures, and reductions in carbon emissions.

2. Background to the Report

- 2.1 The Committee will be aware the Chief Executive determined, in consultation with the Leader and Cabinet Member for Housing and Planning, to self-refer the Council to the Regulator of Social Housing in 2021. Since this referral Officers have been providing further data and details relating to the core issues of non-compliance for the Regulator to consider and review.
- 2.2 Monthly meetings have been taking place with the Regulator to cover issues of focus in terms of the regulatory framework, focussing on the Homes Standard. Our current performance and plans are shared at this meeting. The discussions and requests for information have been provided as required, and this has allowed the Regulator to continue to work with Officers in a constructive and helpful way.
- 2.3 This is the second update report to the newly formed - Housing Overview and Scrutiny Committee. The update reports have confirmed the Regulatory Notice served on the Council and provided an outline of the work that officers would continue to ensure we logically and methodically progress through a programme of improvement.

- 2.4 The Housing Overview and Scrutiny Committee determined that it would wish to receive update reports on progress at each of its meetings to ensure that Members had oversight of broad progress around the key areas of activity and could engage with Officers and scrutinise work where required.
- 2.5 This update report communicates the performance as of the end of July 2023 as communicated with the Regulator of Social Housing in August 2023. This will still identify the following core headings as a means of updating Members and would identify the following information to assist this process, including the latest version of the Improvement Plan (Appendix 2).

3. Key Considerations

- 3.1 **Updating Tenants and Members:** Following on from previous briefings, further All Member Briefings will be arranged to ensure Members are fully informed on progress and continued challenges.
- 3.2 A full tenant consultation exercise was undertaken – “The Big Listen” – in 2022. This involved several questions on both the current experience of tenants in terms of the services the Council offers as a landlord, and what they would like to see prioritised in the Housing Revenue Account Business Plan. The questions were based on the Regulator of Social Housing’s proposed Tenant Satisfaction Measures and the initial report was provided to Rural Overview and Scrutiny Committee in the meeting on 23 June 2022.
- 3.3 In July 2023 we have completed the second annual Tenant Satisfaction Measures survey with the results due shortly. It is proposed the results from this survey are shared at the next Housing Overview and Scrutiny Committee.
- 3.4 We commit to an ongoing programme of stock condition surveys to inform a proactive, planned maintenance programme and reduce the need for more expensive reactive repairs.
- 3.5 A key activity to support the HRA Business Plan review is up-to-date information on the Council’s housing stock. The last full Stock Condition Survey was completed in 2009; good practice suggests comprehensive Stock Condition surveys should be completed every 5 years, usually by undertaking a survey of 20% of the stock each year.
- 3.6 The Council continues to utilise its Rant and Rave feedback, seeking real time feedback from tenants following responsive repairs. We continue to see overall satisfaction of 4.5 out of 5 following completion of more than 1,400 responses, demonstrating sustained high satisfaction at the point where repairs are undertaken.
- 3.7 SKyline continues to provide key information to all tenants and ensure positive engagement for what is happening in the housing service. The next edition is for Winter 2023 and is currently in the content planning stage.

3.8 **Regular Meetings with the Regulator:** Monthly meetings between the Chief Executive, Acting Director of Housing and the Regulator's Officers take place as scheduled; the next meeting at time of writing is due on the 29th of September 2023. Progress has been significant right across the landlord health and safety compliance function (latest monthly figures attached as Appendix One to this report) and the relationship with the Regulator is positive, with the Regulator acknowledging that the Council is moving to a position to seek removal of the Notice that was formally served in February 2021.

3.9 That removal is contingent on three issues:

- (a) Sustained maintenance of performance in relation to the key landlord health and safety areas (i.e. those shown on Appendix One)
- (b) Clear programmes of work related to the actions that arise from those areas (these are provided to the Regulator on a monthly basis)
- (c) A satisfactory external audit of the above, providing external assurance. This external audit is complete, with actions to address potential gaps identified and clear responsibilities and timescales for those actions delegated.

To enable the Regulator to remove the notice we have completed the external audit of our compliance related functions. The outcome of this audit has been shared with the Regulator, a copy of this audit report can be found as Appendix Four - Compliance Review Report Issued 14.07.2022. With the resulting action plan detailing progress on the resulting recommendations for information of the committee at Appendix Five - External Audit Action Plan. We have also included the KPI overview document which identifies the starting position of compliance performance at the point of notice and our current performance, this can be seen as Appendix One – Compliance Areas Direction of Travel.

Committee may find additional comment on Appendix Three - Summary Paper relating to core compliance areas as at July 2023

- 3.9.1 Legionella – 100% compliance in relation to water hygiene.
- 3.9.2 Gas – 99.13% in July, this has increased slightly since February 2023 and of the forty properties without valid certificates all have appropriate up to date actions.
- 3.9.3 Electrical testing – this shows the position in relation to properties (both dwellings and communal areas) with a valid electrical certificate, with the current position being 90.80% in July.
- 3.9.4 Asbestos – this shows 100% compliance in terms of asbestos inspections.
- 3.9.5 Fire Risk Assessments – 100% compliant, this shows all communal blocks assessed as “higher risk” have been inspected, and corrective actions are being programmed and completed. It is consistent with the Council’s Fire Safety Management Plan.
- 3.9.6 Lift inspections – all properties are currently compliant at 100%.

- 3.9.7 Smoke and CO – this shows the position for all the alarms within our properties being 100% compliant. This is a significant achievement and the first time we have reported total compliance in this area. This is a Regulatory requirement which came into force on the 1st of October 2022.
- 3.9.8 Damp and mould – this shows 99.78% compliance and the appointments for CAT1 and CAT2 inspections and works have been made with several tenants refusing access.
- 3.10 **Leadership Compliance Meetings:** Chaired by the Chief Executive and attended by the Leader of the Council, the Cabinet Member for Housing, and the Acting Director of Housing, these meetings have been a continued feature of the more detailed compliance review process being undertaken. Members of this group ensure specific responses to the changing compliance review process and manage tenant and communication responses to actions associated with key service and regulatory responses.
- 3.11 **Regular Reports to Committees and Cabinet:** the necessary reporting to appropriate committees will continue and have changed as per the committee needs. Members are invited to comment on this report content and confirm their views and observations relating to the detail contained within this report.

4. Other Options Considered

- 4.1 These will be further determined through work with the Regulator, the adjusted Improvement Plan, and consideration of key outputs by Members, Leadership Compliance meetings, and All Member briefing sessions as arranged.

5. Reasons for the Recommendations

- 5.1 To secure as determined by the Regulator a return to full compliance in respect of housing services, including the identification of appropriate resources, funds, and service improvements in a timely manner.

6. Consultation

- 6.1 The necessary consultation with the tenants and Members of the Council has been undertaken through timely reporting, dispatch of letters to advise tenants of progress, the latest Skyline publication, dedicated customer telephone enquiry line, and an updated web site detailing compliance issues and signposting services. This process will continue as required and the engagement with tenants particularly will be amended to reflect changing needs and requirements.

7. Appendices

- 7.1 Appendix One – Compliance Areas Direction of Travel

Appendix Two – Housing Improvement Plan July 2023

Appendix Three - Summary Paper relating to core compliance areas as at July 2023

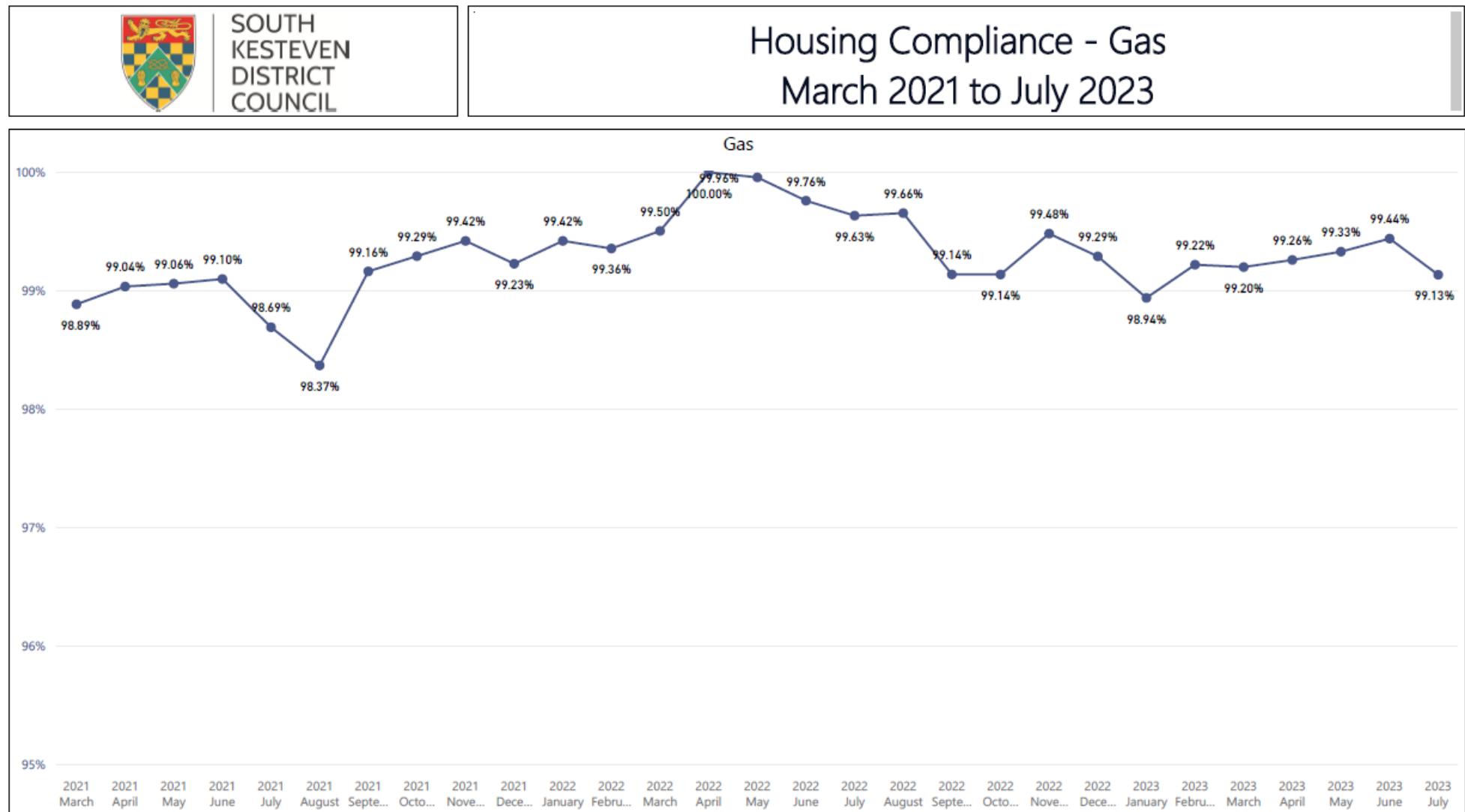
Appendix Four - Compliance Review Report Issued 14.07.2022

Appendix Five - External Audit Action Plan

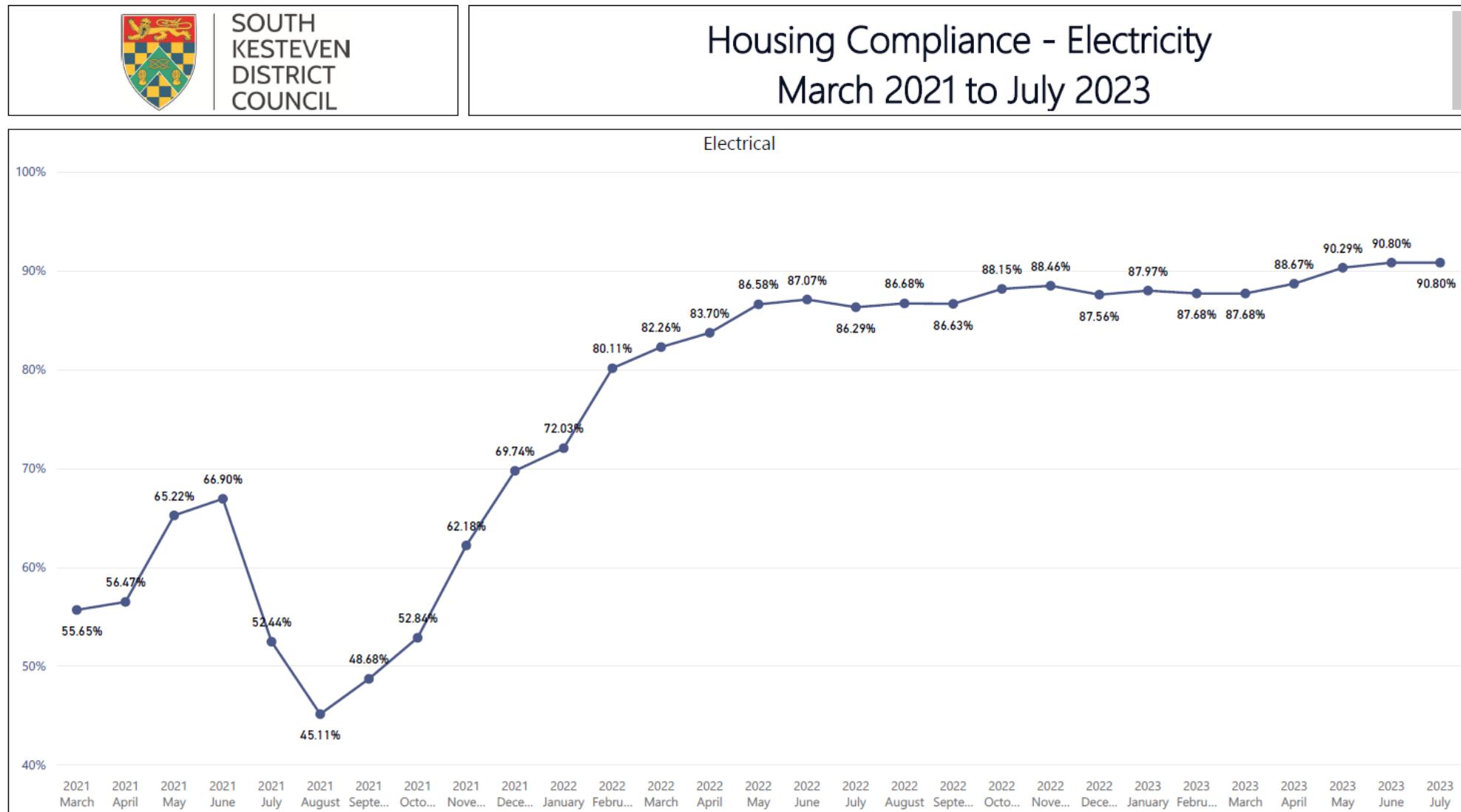
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Compliance Areas – Direction of Travel

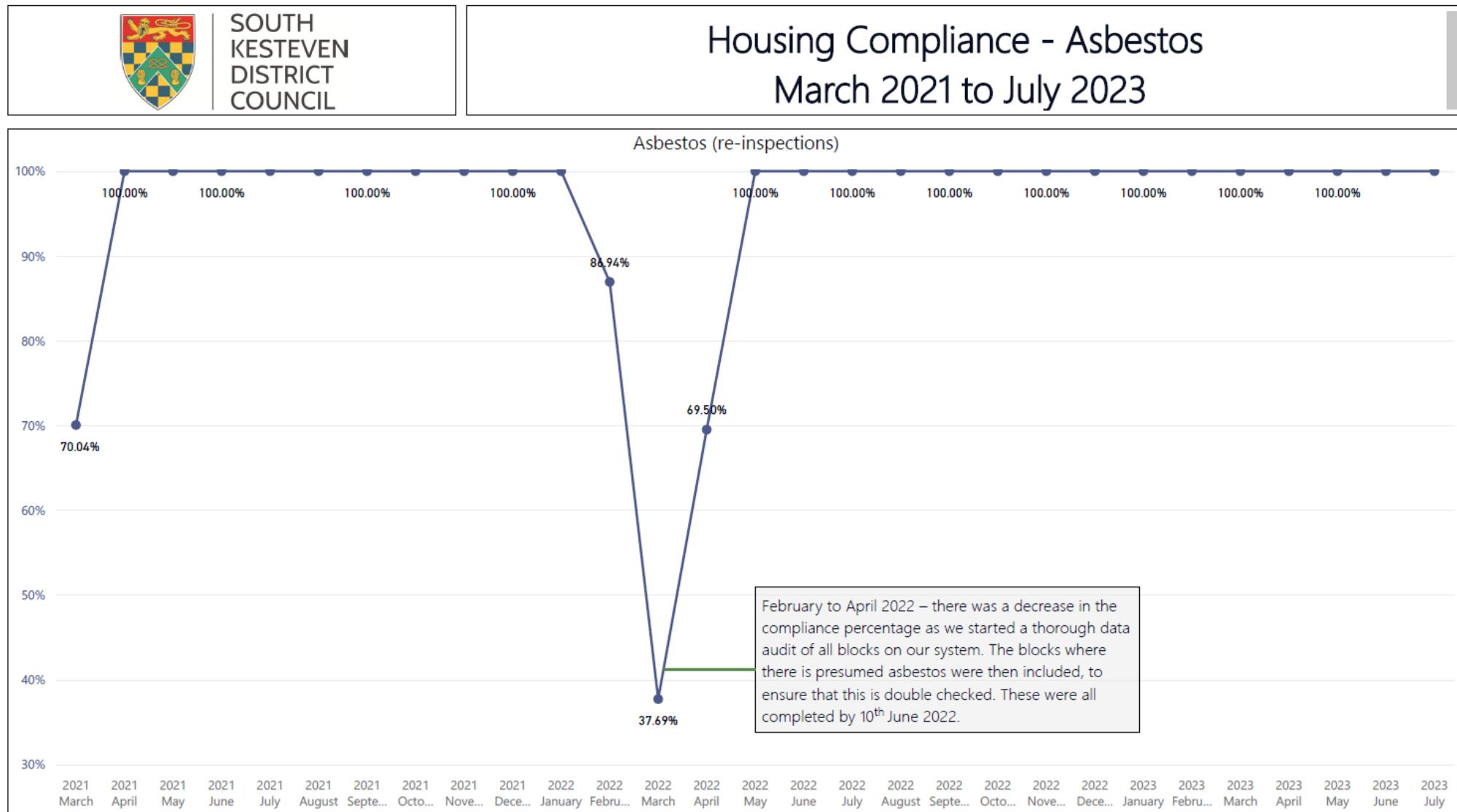
Area	Start of Notice Compliance - April 2021	Current Compliance – July 2023	Direction of Travel	Percentage of Change	Commentary
Legionella	100%	100%	≡	N/A	Sustained performance, only downturn was March 2022 and January 2023 due to additions of locations and re-inspection schedule impacted by sickness.
Gas	98.89%	99.13%	↑	0.24%	Continued performance with enhanced understanding and embedding of consistent process
Electrical	55.65%	90.80%	↑	35.15%	Sustained upward trend since notice implemented, spreadsheet as Appendix 2. Highlights current position and next steps.
Asbestos (re-inspections)	70.04%	100%	↑	29.96%	Improvement since notice with explainable variations due to alignment and inclusion of presumed sites to inspection regime.
Fire Risk Assessments	5.78%	100%	↑	94.22%	Significant sustained improvement, outstanding FRA actions attached as Appendix 3. No high-risk actions outstanding.
Lift inspections	100%	100%	≡	N/A	Sustained performance only reported reductions addressed and resolved.
Smoke & CO	92% (Sept 2022)	100%	↑	8%	Continued upward trend in completion following inclusion of reporting from September 2022
Damp & Mould	99.42% (Nov 2022)	99.78%	↑	0.36%	Upward trend since inclusion of measure in November 2022 aided by recent stock condition data



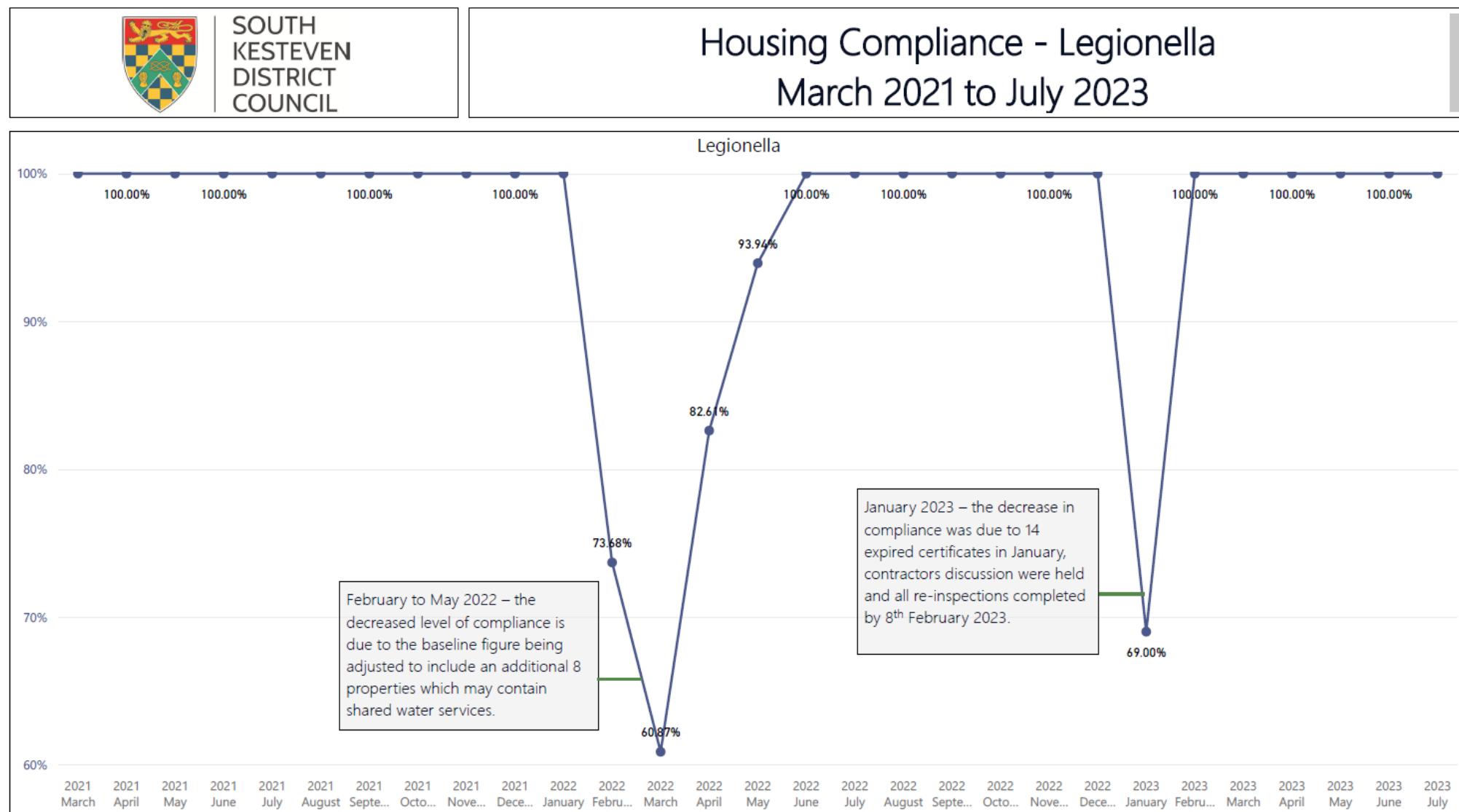
Appendix 1



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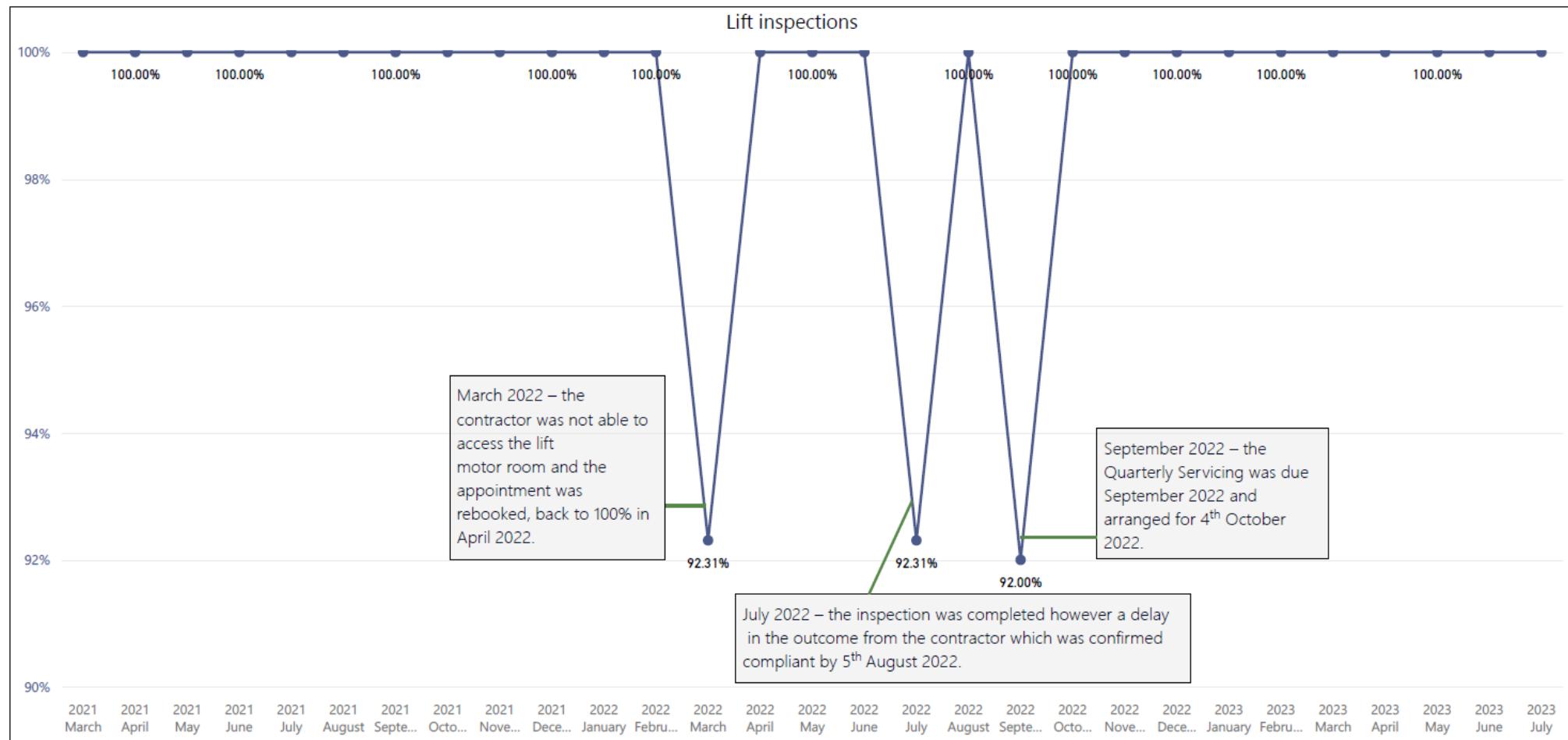
Appendix 1



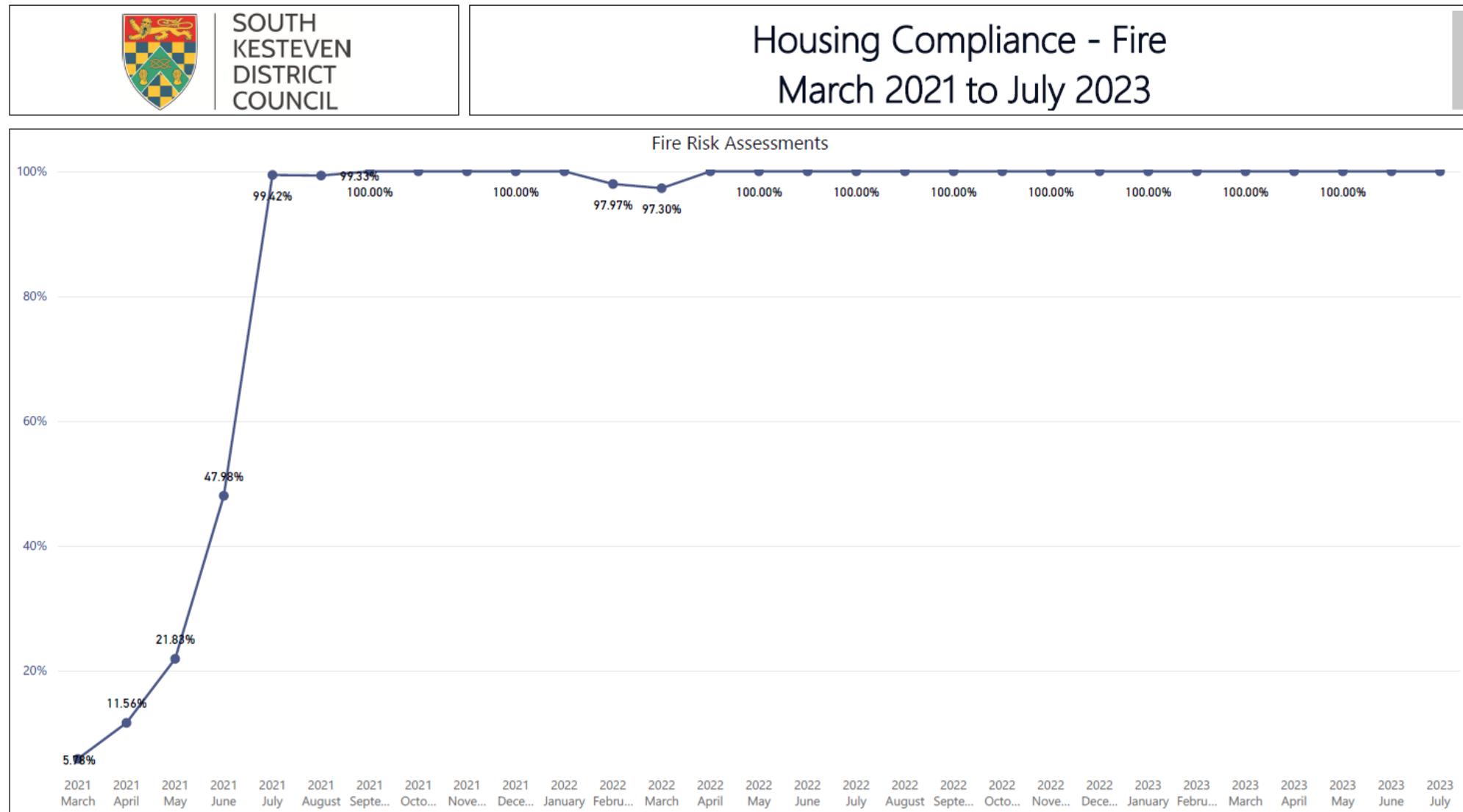
SOUTH
KESTEVEN
DISTRICT
COUNCIL

Housing Compliance - Lifts

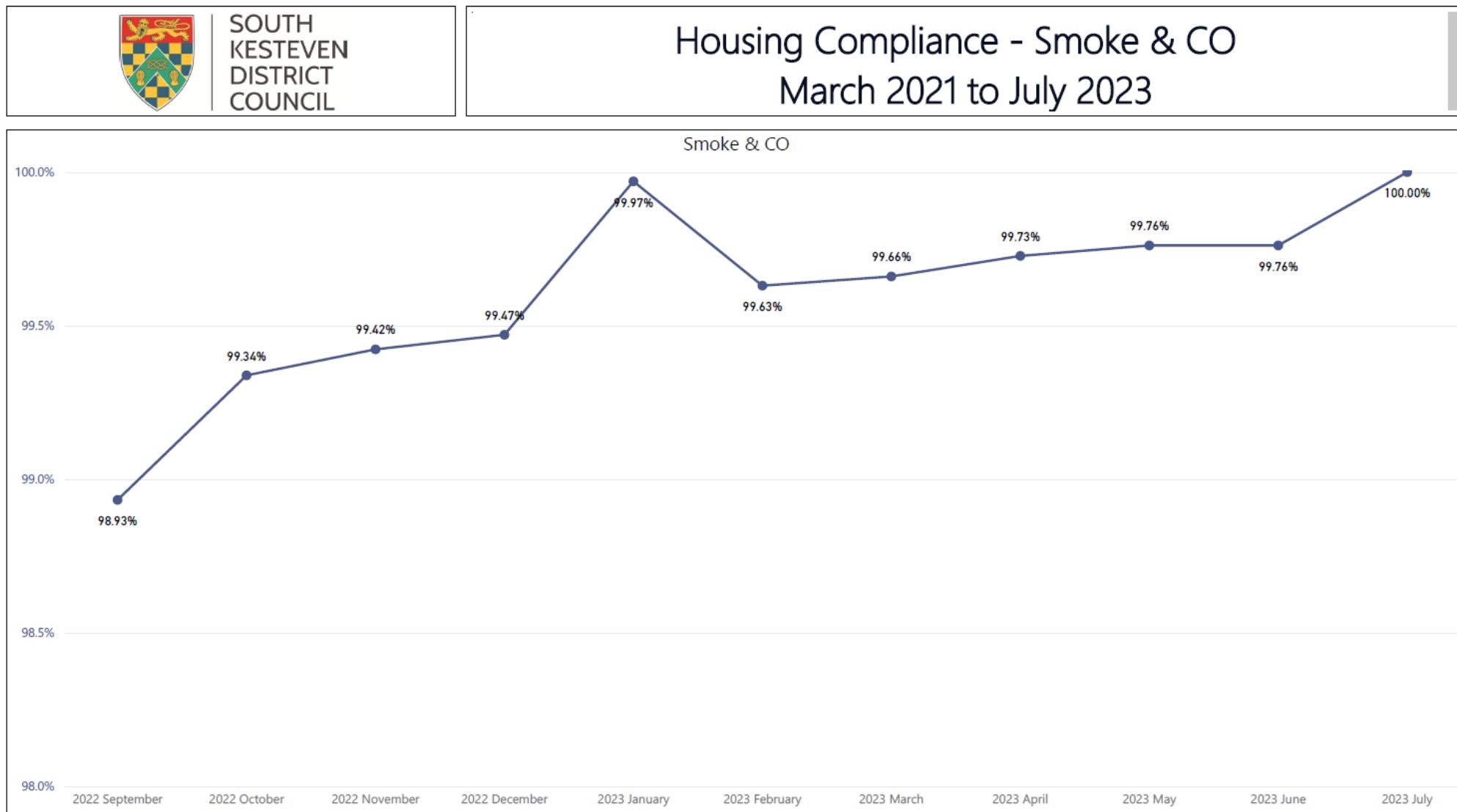
March 2021 to July 2023



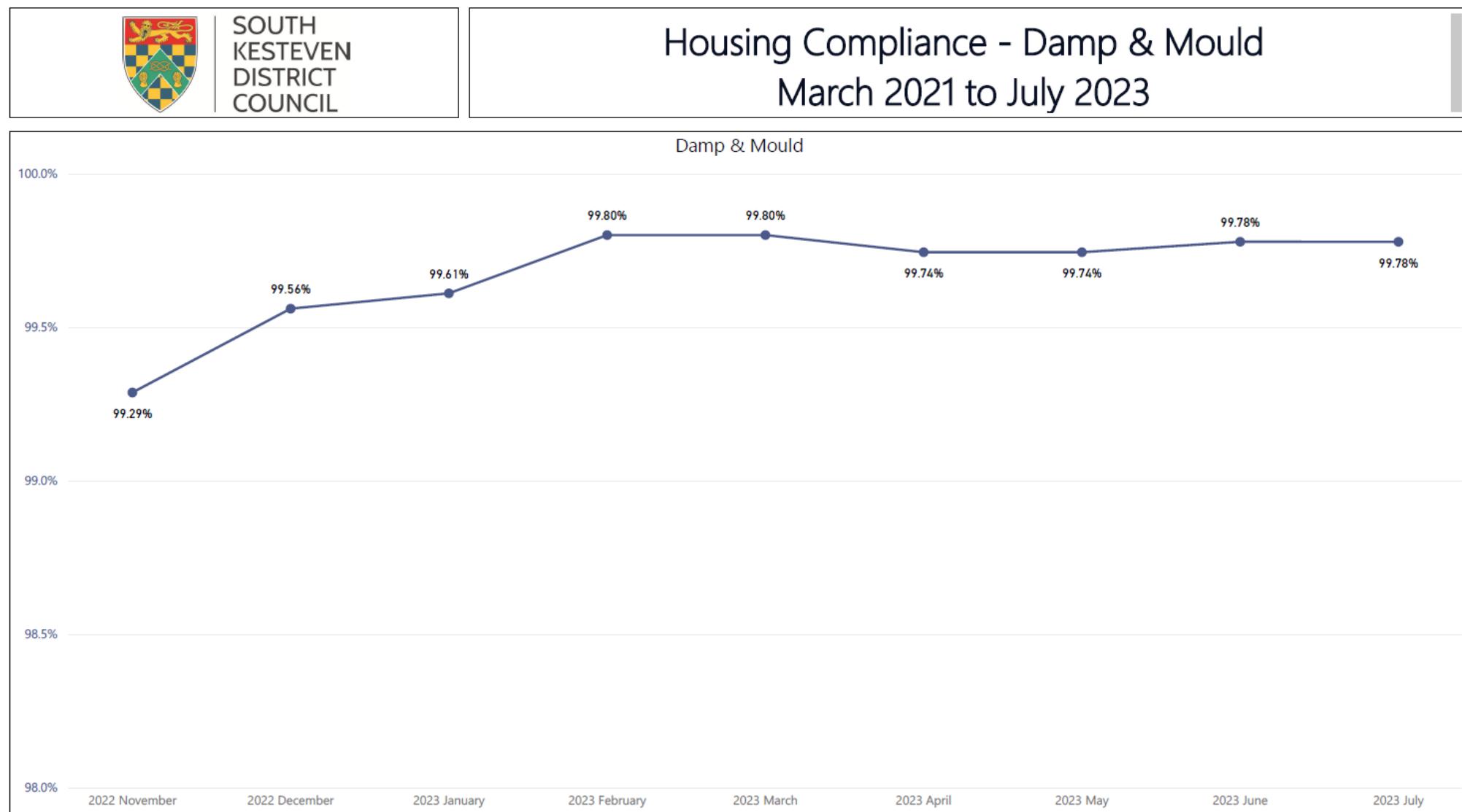
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Appendix 1

	Mar-21	21.03.21			16.04.21			20.05.21			18.06.21				
		Baseline number required (properties/blocks)	Compliant	Non Compliant	% Compliant	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant
Legionella	444	444	0	100.00%	444	0	100.00%	444	0	0	100.00%	444	444	0	100.00%
Gas	4666	4614	52	98.89%	4621	45	99.04%	4663	4619	44	99.06%	4663	4621	42	99.10%
Electrical	6526	3632	2894	55.65%	3685	2841	56.47%	6526	4256	2270	65.22%	6526	4366	2160	66.90%
Asbestos (re-inspections)	257	180	77	70.04%	257	0	100.00%	257	257	0	100.00%	257	257	0	100.00%
Fire Risk Assessments	173	10	163	5.78%	20	153	11.56%	173	31	142	21.83%	173	83	90	47.98%
Lift inspections	13	13	0	100.00%	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%
Smoke & CO															
Damp & Mould															

Compliance Activity	Red	Amber	Green
Legionella	<95%	95.01-99.99%	100%
Gas	<99.8%	99.81-99.99%	100%
Electrical	<98%	98.01-99.99%	100%
Asbestos	<85%	85.01-99.99%	100%
FRA Actions	<97%	97.01-99.99%	100%

Appendix 1

	24.06.21				15.07.21				25.08.21				22.09.21				15.10.21			
	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant
Legionella	444	444	0	100.00%	444	444	0	100.00%	444	444	0	100.00%	444	444	0	100.00%	444	444	0	100.00%
Gas	4663	4621	42	99.10%	4663	4602	61	98.69%	4663	4596	67	98.56%	4663	4624	39	99.16%	4663	4630	33	99.29%
Electrical	6526	4366	2160	66.90%	6526	3422	3104	52.44%	6245	2751	3494	44.05%	6245	3040	3205	48.68%	6245	3300	2945	52.84%
Asbestos (re-inspections)	257	257	0	100.00%	257	257	0	100.00%	257	257	0	100.00%	257	257	0	100.00%	257	257	0	100.00%
Fire Risk Assessments	173	96	77	55.49%	173	173	1	100.00%	148	148	0	100.00%	148	148	0	100.00%	148	148	0	100.00%
Lift inspections	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%
Smoke & CO																				
Damp & Mould																				

Appendix 1

	21/01/2022				18/02/2022				31/03/2022				29/04/2022				31/05/2022			
	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant
Legionella	444	444	0	100.00%	38	28	10	73.68%	46	28	18	60.87%	46	38	8	82.61%	33	31	2	93.94%
Gas	4663	4636	27	99.42%	4663	4635	28	99.40%	4645	4622	23	99.50%	4645	4645	0	100.00%	4644	4642	2	99.96%
Electrical	6245	4498	1747	72.03%	6245	5003	1242	80.11%	6216	5113	1103	82.26%	6216	5203	1013	83.70%	6087	5270	817	86.58%
Asbestos (re-inspections)	257	257	0	100.00%	222	193	29	86.94%	260	98	162	37.69%	259	180	79	69.50%	204	204	0	100.00%
Fire Risk Assessments	148	148	0	100.00%	148	148	0	100.00%	148	145	4	97.97%	148	148	0	100.00%	148	148	0	100.00%
Lift inspections	13	13	0	100.00%	13	13	0	100.00%	13	12	1	92.31%	13	13	0	100.00%	13	13	0	100%
Smoke & CO																				
Damp & Mould																				

Appendix 1

	30/06/2022				31/07/2022				31/08/2022				30/09/2022				31/10/2022			
	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant
Legionella	33	33	0	100.00%	33	33	0	100.00%	33	33	0	100.00%	33	33	0	100.00%	33	33	0	100.00%
Gas	4644	4633	11	99.76%	4644	4627	17	99.63%	4644	4628	16	99.66%	4639	4599	40	99.14%	4635	4595	40	99.14%
Electrical	6087	5300	787	87.07%	6083	5249	834	86.29%	6079	5269	810	86.68%	6074	5269	805	86.75%	6074	5354	720	88.15%
Asbestos (re-inspections)	204	204	0	100.00%	213	213	0	100.00%	213	213	0	100.00%	213	213	0	100.00%	213	213	0	100.00%
Fire Risk Assessments	148	148	0	100.00%	148	148	0	100.00%	148	148	0	100.00%	148	148	0	100.00%	148	148	0	100.00%
Lift inspections	13	13	0	100%	13	12	1	92%	13	13	0	100.00%	13	12	1	92.00%	13	13	0	100.00%
Smoke & CO													5898	5835	63	98.93%	5889	5850	39	99.34%
Damp & Mould																				

Appendix 1

	30/11/2022				31/12/2022				31/01/2023				28/02/2023				31/03/2023			
	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant
Legionella	33	33	0	100.00%	33	33	0	100.00%	33	19	14	69.00%	33	33	0	100.00%	33	33	0	100.00%
Gas	4635	4611	24	99.48%	4635	4602	33	99.29%	4635	4586	49	98.94%	4626	4590	36	99.22%	4626	4589	37	99.20%
Electrical	6072	5364	708	88.46%	6053	5300	753	87.56%	6051	5323	728	87.97%	6049	5304	745	87.68%	6049	5304	745	87.68%
Asbestos (re-inspections)	213	213	0	100.00%	213	213	0	100.00%	213	213	0	100.00%	259	259	0	100.00%	259	259	0	100.00%
Fire Risk Assessments	148	148	0	100.00%	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%
Lift inspections	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%
Smoke & CO	5887	5853	34	99.42%	5868	5837	31	99.47%	5868	5846	22	99.63%	5868	5846	22	99.63%	5865	5845	20	99.66%
Damp & Mould	5887	5845	42	99.29%	5868	5842	26	99.56%	5868	5845	23	99.61%	5868	5853	15	99.74%	5865	5853	12	99.80%

Compliance Activity	Red	Amber	Green
Legionella	<95%	95.01-99.99%	100.00%
Gas	<99.00%	99.01-99.99%	100.00%
Electrical	<85%	85.01-99.99%	100.00%
Asbestos	<85%	85.01-99.99%	100.00%
FRA Actions	<97%	97.01-99.99%	100.00%
Smoke & CO	<97%	97.01-99.99%	100.00%
Damp and mould	<97%	97.01-99.99%	100.00%

RAG rating adjusted for January 2023 figures following feedback from RSH.

Appendix 1

	30/04/2023				31/05/2023				30/06/2023				31/07/2023			
	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant
Legionella	33	33	0	100.00%	33	33	0	100.00%	33	33	0	100.00%	33	33	0	100.00%
Gas	4625	4591	34	99.26%	4625	4594	31	99.33%	4625	4602	23	99.44%	4624	4584	40	99.13%
Electrical	6045	5360	685	88.67%	6044	5457	587	90.29%	6044	5488	556	90.80%	6043	5487	556	90.80%
Asbestos (re-inspections)	259	259	0	100.00%	259	259	0	100.00%	259	259	0	100.00%	259	259	0	100.00%
Fire Risk Assessments	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%
Lift inspections	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%
Smoke & CO	5860	5844	16	99.73%	5860	5846	14	99.76%	5860	5846	14	99.76%	5858	5858	0	100.00%
Damp & Mould	5860	5845	15	99.74%	5860	5845	15	99.74%	5860	5847	13	99.78%	5858	5845	13	99.78%

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Housing Improvement Action Plan
v19 July 2023

Action number	Issue	Detail	How identified	Action to address	Target	Budget	Lead Officer	RAG	Direction of travel	Progress update				
										Mar-23	Apr-23	May-23	Jun-23	Jul-23
HIAP1	Current IHMS inadequate	Northgate implementation paused Summer 2021 to review, plan, costs, scope, and await senior management recruitment and re assess resource needs to manage a future implementation. Report to CMT 24.11.21 to agree project implementation and procurement method	Self assessment Nov 20 and ongoing	Procurement and project implementation	Framework procurement December 2021, evaluation January 2021, with system go-live April 2023.	Budget approved in HRA for 21/22 and future years projections.	ADH	Yellow	+	Following the announcement by the supplier that the system shall not be further developed has left us to decide our future direction.	Contract variation signed and approved, revised Go-Live date agreed as 13th of November 2023.	Project plan circulated to the Board and agreed.	Progressing well, environments built, new PM starting on the 13th of July 2023.	New PM started in July 2023 and project is on track for go live in November 2023.
HIAP2	Allocations based on offers, not CBL	Consultation on CBL carried out during the first 3 weeks of September – surveys sent out & workshops undertaken. Discussion paper to Communities Overview and Scrutiny Committee meeting early 2022. Members briefing discussion in January.	Self assessment Nov 20 and ongoing	Complete Choice Based Lettings and Allocation review process and achieve introduction of revised policy and CBL solution including training.	April 2022 Policy; Launch October 2022	Costs TBC	ADH	Green	=	Project Manager appointed and project plan being finalised.	Project plan underway. Initial training delivered drafts for changes to Policy in progress awaiting approval.	Project plan agreed and key milestones commenced.	Project ongoing according to the plan.	Project progressing well, letter has been sent w/c 7th August 2023 to all residents advising the need to reapply and to all Councillors to ensure they are informed.
HIAP3	Lack of performance management framework allowing real-time, automated information	Complete review of core housing KPI and customer standards for Housing service. This to include key issues such as void times, jobs out of time, compliance etc.	Self assessment Nov 20 and ongoing	Service blueprints provide key PIs, agreed by management team. Strong link to IHMS project	April 2023 full roll-out	Existing resources	DHP	Green	=					
HIAP4	Grounds maintenance contract review.	Uncertainty around VFM and contract management anecdotally poor	Self assessment Nov 20 and ongoing	Clear roles for contract management as part of Estate Management function		Budget agreed and included in 21/22 budget significant uplift approved for better spec.	HofHS	Green	=	Service charges to be introduced October 2023 following consultation and adoption by Cabinet.	Service charges to be considered at Cabinet in September 2023, following the consultation and review of relevant committee.	Ongoing.	Work commenced for reviewing the service charges and ongoing.	Service charge review ongoing, clear roles confirmed in 2022 for Estates Officer.
HIAP5	Lack of strategy and policy framework	Complete review of key documents and identify work plan and timelines. Revised Tenant engagement Strategy planned.	Self assessment Nov 20 and ongoing	Complete review of key documents and identify work plan and timelines based on risk. Aids and Adaptations Policy, Right to Buy Policy, Compensation Policy and Rechargeable Repairs Policy in first tranche.	Complete first tranche July 2022	Existing resources	ADH	Yellow	+	Final changes and comments being made to the policy framework document by managers.	Final version awaiting political input following recent elections.	Final version still awaiting political input following recent elections.	Work plan identified, THC (Total Housing Compliance) suite of policies on the forward plan for November 2023.	Policy framework agreed with Heads of Service and all compliance policies identified (THC) outlined on the housing forward plan.
HIAP6	Review Asset Management Plan and HRA Business Plan.	This is a document that can only be drafted once the outcome of the stock condition survey is determined.	Self assessment Nov 20 and ongoing	Stock Condition Survey underway. Asset Management Strategy to be developed as survey data is analysed. The Target date for completion of this work is end of March 2022.	Jul-22	Existing resources	DHP (supported AD Finance)	Yellow	=	Draft HRA Business Plan received and feedback from team is being work on. Further partnership meeting in April with consultants and team.	HRA business plan changes being made internally and meeting with consultants this month.	Changes ongoing with the business plan for the draft to be finalised this month.	Changes still in progress and estimate timeline is October Cabinet for review.	HRA BP ongoing and timeline remains the same.
HIAP7	The Council does not have an Empty Homes Strategy		Self assessment Nov 20 and ongoing	Draft complete	Apr-22	Existing resources	DHP	Green	+					

Action number	Issue	Detail	How identified	Action to address	Target	Budget	Lead Officer	RAG	Direction of travel	Mar-23	Apr-23	May-23	Jun-23	Jul-23
HIAP8	Engagement with Tenants to inform and seek views on service standards	Lack of real time feedback	Self assessment Nov 20 and ongoing	Rant and Rave procured.	Apr-22	Budget approved	HoTS	Green	+	Rant & Rave 1000+ interactions scoring 4.5/5. Next edition of SKyline first planning meeting scheduled for this month and initial ideas drafted.	Rant & Rave in excess of 1,100 interactions scoring 4.5/5. First planning meeting complete and draft awaiting approval.	Rant & Rave in excess of 1,200 interactions scoring 4.5/5. SKyline draft awaiting approval.	Rant & Rave in excess of 1,300 interactions scoring 4.5/5. SKyline magazine printed and delivery in progress. TSM survey ongoing with Acuity.	Rant & Rave in excess of 1,400 interactions scoring 4.5/5. SKyline magazine for Summer 2023 circulated to tenants and on the website. TSM survey ongoing with Acuity.

Regulatory Reference	Summary	Action number	Issue	Detail	How identified	Action to address	Target	Budget	Lead Officer	RAG	Direction of travel	Progress Update				
												Mar-23	Apr-23	May-23	Jun-23	Jul-23
		HS2	Lack of stock condition information	Last full Stock Condition Survey completed 2009. Sample Stock Condition surveys by internal surveyors been undertaken annually, but not consistent around detail and numbers.	Self Assessment Nov 20	Commission full stock condition survey in 2021/22.	Mar-22	£780k Budget approved by Full Council in December 2020.	HofTS	+						
		HS3	Revised capital improvements programme for 21/22 and future financial years. This to include potential new priorities such as fencing programme, windows/door entry systems, FRA's and electrical certificates.	Heavily dependent on Action 2	Self Assessment Nov 20	Revised capital programmes based on previous years and emerging issues.	Jul-22	Budget setting 2022/23	ADH	=	Full bid approved enabling energy works to 332 properties. Contract discussions ongoing with mobilisation due within 6-8 weeks.	Ongoing.	Fire Compartmentation contract awarded at Cabinet in May 2023.	SHDF bid confirmation and recurring to the posts required.	PM for the SHDF rollout has been recruited to and supporting posts underway.	
		HIAP6	Review Asset Management Plan and HRA Business Plan.	This is a document that can only be drafted once the outcome of the stock condition survey is determined.	Self assessment Nov 20 and ongoing	Stock Condition Survey underway. Asset Management Strategy to be developed as survey data is analysed. The Target date for completion of this work is end of March 2022	Jul-22	Existing resources	DHP (supported AD Finance)	=	HRA business plan in draft form with further changes being made from team feedback, on forward plan for scrutiny in June 2023.	HRA business plan further changes underway and meeting with the consultant this month.	Finalisation of draft in preparation for consultation with tenants and members	Ongoing.	HRA business plan being finalised with internal departments.	
1.1c	<i>in agreeing a local offer, ensure that it is set at a level not less than these standards</i>	HS4	No local offer	Not a requirement; low priority pending relaunch of tenant engagement function and result of "Big Listen" survey.	Self Assessment Dec 21					=	This years TSM survey is being planned for completion in July 2023 with the work for the new engagement strategy ongoing.	TSM survey procured through Acuity.	TSM survey to be issued 3rd of July with report due Sep/Oct	TSM survey ongoing, good take up so far.	TSM ongoing with residents.	
1.2a	<i>provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choices to, tenants, and has the objective of completing repairs and improvements right first time</i>	HSS	Anecdotal evidence of poor service, lack of pre and post inspection, lack of benchmarking, limited stock condition information.	Service blueprint and restructure to clarify roles and resources, strong link to IHMS procurement and process reviews; confusing number of contractual terms for trades team	Self assessment Nov 20 and ongoing	Restructure; identify and improve processes on a risk basis; IHMS procurement; training and performance management.	Jul-22		DHP	+	Phase one of the restructure complete.	Phase two of the restructure pending, this is for the areas not covered in phase one.	Phase two has been delayed awaiting political input following recent elections.	Phase two restructure due for completion September 2023.	Phase two restructure yet to commence and will start around September 2023 onwards.	

Regulatory Reference	Summary	Action number	Issue	Detail	How identified	Action to address	Target	Budget	Lead Officer	RAG	Direction of travel	Mar-23	Apr-23	May-23	Jun-23	Jul-23
1.2b	<i>meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.</i>	HS6	No effective IT solution for monitoring and managing compliance requirements	Fire, gas and electrical priority	Self Assessment Nov 20	Propeller System procured and launched 2021.	Apr-22	Budget approved. Costs £76k 20/21 financial year then £39k per year.	HofTS	=	Ongoing.	Options being considered and review for compliance and interfacing possible to IHMS system.	Current options being reviewed with the systems contract coming to an end.	We are aware of the importance of this strand of work, once the IHMS is live we shall then commence the Asset Mgt system upgrade, all data validation regarding stock numbers shall be via the IHMS data.	Ongoing.	
		HS7	Sheltered housing compliance and operational review required.	Separate Action Plan	Self assessment June 21		Apr-22			+	Procurement ongoing.	Initial conversations with external consultant in progress.	Consultant being considered for the review.	Consultant has started and review underway.	Review of sheltered properties underway and findings from consultant expected around September 2023.	
		HS8	Wide issues of non-compliance identified by Internal Audit report	Delivery of key Audit recommendations	Audit report November 2020 and October 2021	Close monitoring of KPIs; reporting to Scrutiny Committees	Apr-22	Existing resources	DHP	=	Finalisation of draft and design prior to consultation.	Final draft with wider management team prior to political and tenant consultation.	New housing Scrutiny meeting convened by members, initial meeting held to agree scope and points to be covered	First Housing O&S scheduled for the 13th of July.	External audit on compliance area received and action plan in draft. The first Housing O&S took place in July 2023 and successfully updated on current compliance activity, voids and allocations policy amended in line with CBL.	
2.1.1	<i>shall ensure their tenants are aware of the reasons for any period of non-compliance, their plan to achieve compliance and then report on progress delivering this plan.</i>	HS9	Provide information and reassurance for tenants regarding regulatory notice and improvements	Information and updates provided on service of notice	Self Assessment Nov 20	Ongoing	Ongoing	Existing resources	DHP	=	Meeting scheduled for this month for Skyline to identify content and timeline for compilation.	Timeline agree and work underway for documents to go into Skyline, this will include a compliance section.	Draft Skyline edition for Summer is being reviewed for approval.	Summer Skyline approved and completed.	Skyline for Summer has been circulated updating on compliance areas, changes in damp and mould and other key areas. There has also been a update to Housing O&S in July 2023 which is accessible to all through ModernGov.	
2.2.1	<i>ensure a prudent, planned approach to repairs and maintenance of homes and communal areas. This should demonstrate an appropriate balance of planned and responsive repairs, and value for money. The approach should include: responsive and cyclical repairs, planned and capital work, work on empty properties, and adaptations.</i>	HS10	Anecdotal evidence of poor service, lack of pre and post inspection, lack of benchmarking, limited stock condition information.	Service blueprint and restructure to clarify roles and resources, strong link to IHMS procurement and process reviews	Self assessment Nov 20 and ongoing	Restructure; identify and improve processes on a risk basis; IHMS procurement; training and performance management	Jul-22	Existing resources	DHP	+	Restructure embedding well with workflow development ongoing, KPI suites identified on service plans.	Recruitment to first positions within phase two of restructure ongoing.	Phase two has been delayed awaiting political input following recent elections.	Phase two sign off September 2023	New IHMS system underway with expected 'go live' date November 2023 and staffing to be confirmed in phase two, expected sign off in September 2023.	
2.2.2	<i>co-operate with relevant organisations to provide an adaptations service that meets tenants' needs.</i>	HS11	Engagement with OT service haphazard, general approach is to complete adaptations regardless of practicality	No clear policy on Aids and Adaptations	Self assessment December 2021	Adopt Aids and Adaptation Policy	Apr-22	Existing resources	HofHS	+						

Regulatory Reference	Summary	Action number	Issue	Detail	How identified	Action to address	Target	Budget	Lead Officer	RAG	Direction of travel	Mar-23	Apr-23	May-23	Jun-23	Jul-23
2.2.3	Asbestos Action Plan.	HS12	Coordinated action plan to mitigate current asbestos risks, ensure constant data management moving forward.	Action plan	Self assessment May 22	Action identified on plan	Dec-22	Existing resources	HofTS	+						

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South Kesteven District Council - Landlord H&S KPIs

	31/12/2022				31/01/2023				28/02/2023				31/03/2023				30/04/2023				31/05/2023				30/06/2023				31/07/2023				Comments
	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	Baseline number	Compliant	Non Compliant	% Compliant	
Legionella	33	33	0	100.00%	33	19	14	69.00%	33	33	0	100.00%	33	33	0	100.00%	33	33	0	100.00%	33	33	0	100.00%	33	33	0	100.00%					
Gas	4635	4602	33	99.29%	4635	4586	49	98.94%	4626	4590	36	99.22%	4626	4589	37	99.20%	4625	4591	34	99.26%	4625	4594	31	99.33%	4625	4602	23	99.44%	4624	4584	40	99.13%	Of the 40 properties 25 are newly non compliant. A further 2 are void awaiting capping certificates and 2 requiring multiple trade attendance. A court day has been requested for the oldest 20 properties and we are awaiting a response.
Electrical	6053	5300	753	87.56%	6051	5323	728	87.97%	6049	5304	745	87.68%	6049	5304	745	87.68%	6045	5360	685	88.67%	6044	5457	587	90.29%	6044	5488	556	90.80%	6043	5487	556	90.80%	Work is ongoing with the contractor to gain access to targeted properties. We have had 12 properties become non-compliant over June and July, this is the reason the figures appear static.
Asbestos (re-inspections)	213	213	0	100.00%	213	213	0	100.00%	259	259	0	100.00%	259	259	0	100.00%	259	259	0	100.00%	259	259	0	100.00%	259	259	0	100.00%		Re-inspections commence Q2 2024.			
Fire Risk Assessments	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%	146	146	0	100.00%					
Lift inspections	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	13	13	0	100.00%	LOLER 100% complete.				
Smoke & CO	5868	5837	31	99.47%	5868	5846	22	99.63%	5868	5846	22	99.63%	5865	5845	20	99.66%	5860	5844	16	99.73%	5860	5846	14	99.76%	5860	5846	14	99.76%	5858	5858	0	100.00%	3 tenancies under NOSP due to historic access issues.
Damp & Mould	5868	5842	26	99.56%	5868	5845	23	99.61%	5868	5853	15	99.74%	5865	5853	12	99.80%	5860	5845	15	99.74%	5860	5845	15	99.74%	5860	5847	13	99.78%	5858	5845	13	99.78%	Cat 1 - 3 all in progress Cat 2 - 10 outstanding; 4 refused

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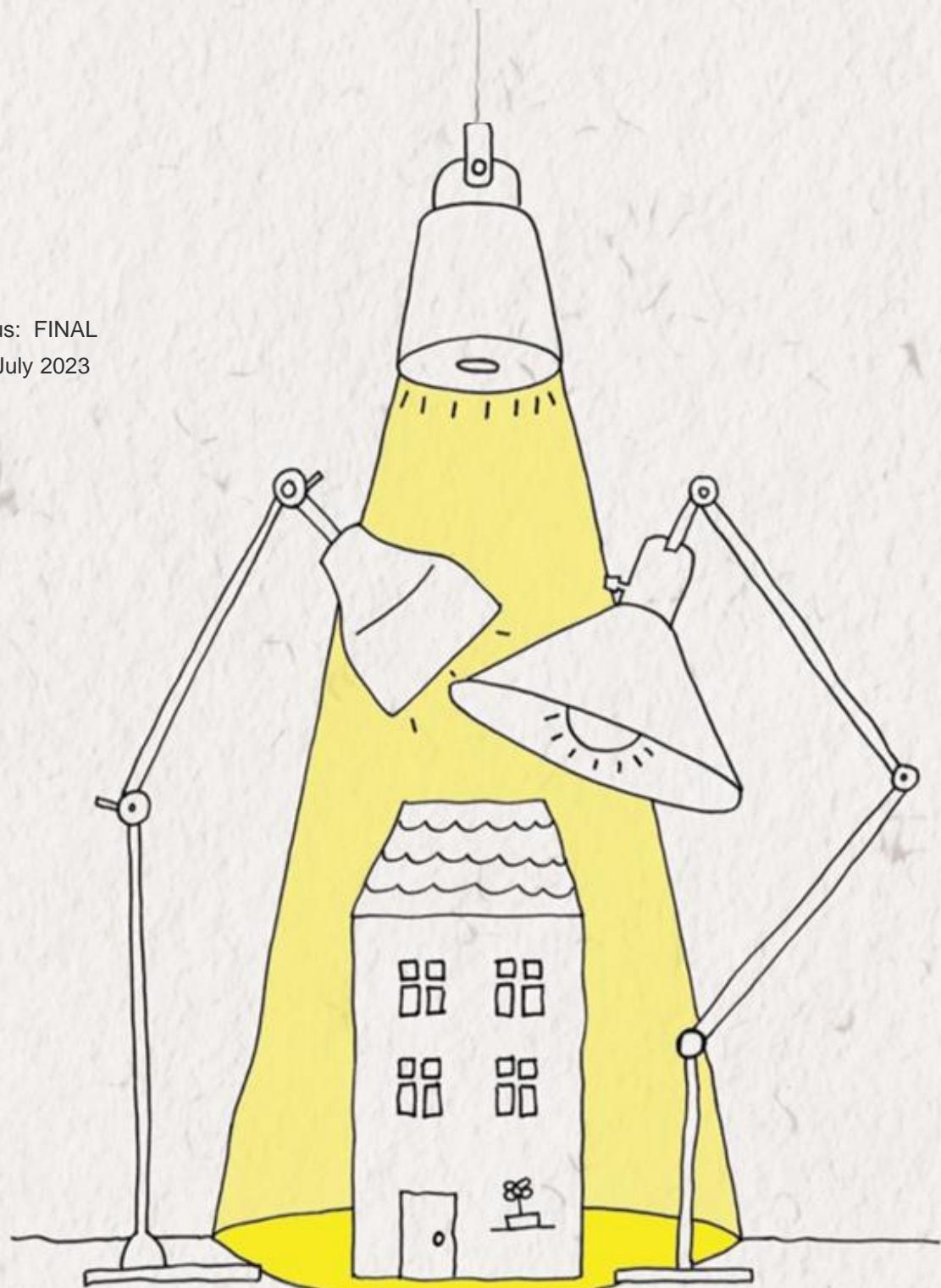
Compliance Activity	Red	Amber	Green
Legionella	95.01-99.99%	100.00%	
Gas	99.01-99.99%	100.00%	
Electrical	85.01-99.99%	100.00%	
Asbestos	85.01-99.99%	100.00%	
FRA Actions	97.01-99.99%	100.00%	
Smoke & CO	97.01-99.99%	100.00%	
Damp and mould	97.01-99.99%	100.00%	

RAG rating adjusted for January 2023 figures following feedback from RSH.

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COMPLIANCE REVIEW

Report Status: FINAL
Issued: 14 July 2023

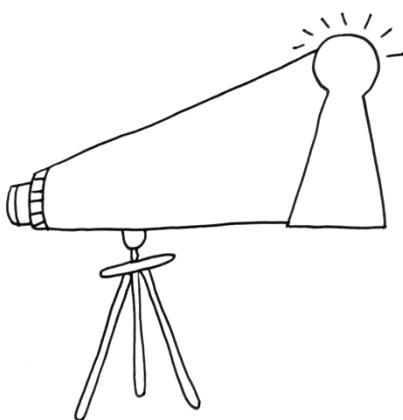


SOUTH
KESTEVEN
DISTRICT
COUNCIL

BEEVER
AND
STRUTHERS
SOCIAL HOUSING

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Disclaimer: Our reports will be delivered to you on the understanding that reliance will only be placed upon them by management and by the Board members in the normal course of their duties and that they will not be made available to persons other than as stated in these terms of engagement.

No responsibility is accepted by us for any reliance that may be placed on our reports by any third parties unless our permission is sought for the provision of such reports to specified third parties and such permission is given by us in writing prior to the provision of the reports to the third parties specified.

INTRODUCTION AND BACKGROUND

- 1.1 We were requested to review the data integrity, procedures and controls in place to ensure that all of the landlord mandatory and good practice health and safety compliance functions are operating as intended and that this is sufficient to meet the Regulator of Social Housing's Regulatory Standards.
- 1.2 South Kesteven District Council (SKDC) owns over 6,000 homes across Lincolnshire.
- 1.3 SKDC self-referred to the Regulator of Social Housing regarding a breach of the Home Standard in 2021 and a regulatory notice was issued. Since then, SKDC has been working towards a compliant position.
- 1.4 Propeller (Housing Management System) and Apex (Asset Management System) are used to hold core property and asset data; SKDC has stock condition surveys for roughly 80% of stock completed in the previous 18 months.
- 1.5 A large data project has been embarked upon to cleanse and ensure that data is reliable and accurate; historical working arrangements has resulted in Propeller and Apex becoming unwieldy; in some areas (such as Fire Safety), spreadsheets are currently used to manage compliance programmes due to the configuration of these systems as set up by previous staff.
- 1.6 SKDC plans to change both the Housing Management and Asset Management system in the next 12 months.
- 1.7 All areas of property compliance are overseen by the Acting Director of Housing, with operational management by the Health and Safety Manager, supported by the Head of Housing.
- 1.8 Monthly Internal Compliance reports are generated, which are seen by the Regulator of Social Housing. These key performance indicator (KPI) reports cover the 'big six' compliance areas, as well as smoke and carbon monoxide and damp and mould.
- 1.9 Performance as at the end of March 2023 (for the areas under our review) was reported as follows:

Compliance Area	Number of applicable units	Number compliant	Number non-compliant	% Compliant
Legionella	33	33	0	100%
Gas	4,626	4,589	37	99.20%
Electrical	6,049	5,304	745	87.68%
Asbestos (re-inspections)	259	259	0	100%
Fire Risk Assessments	146	146	0	100%
Lift inspections	13	13	0	100%
Smoke and Carbon Monoxide	5,865	5,845	20	99.66%

OBJECTIVES AND OUR APPROACH

Objectives

2.1 The objective of this work was to review the processes to manage the 'big six' compliance areas, as well as compliance with Smoke and Carbon Monoxide Regulations, and to validate the figures reported as part of the 'Internal Compliance Reports'. Our assessment included a review of the appropriateness and effectiveness of the systems and processes in place to manage these compliance areas and produce reports – our recommendations will help support the establishment of a more comprehensive control environment.

Approach

3.1 Our approach to reviewing the management of the compliance areas under scope was to assess Policies, Procedures and working practices followed by staff in the management of data and contractors (where appropriate), as well as the processes to gather and report on data. This included the following steps:

3.2 Review and validation of reporting: We reviewed the current format of reporting and validate reported figures to data held within systems or spreadsheets.

3.3 Review of documentation: We reviewed Policies and Procedures as appropriate to each compliance area under review. Our focus was to ensure that relevant legislation was referenced, responsibilities are clearly outlined, controls for the management of data are recorded and that other controls referenced are in line with legislative requirements and sector practices.

3.4 Approaches to data quality: We reviewed of all processes and practices across the organisation to ensure the consistency and reliability of data used in the management of compliance, and whether these processes are operating effectively.

3.5 Approaches to contractor management: We reviewed the processes in place to manage contractors, and whether SKDC receives necessary assurances over contractor performance, and holds contractors to account where poor performance is highlighted.

3.6 Review of legislative compliance: We reviewed the processes undertaken by SKDC to ensure that legislative compliance is maintained with the following legislation for each applicable area of the 'big six' compliance areas:

- A. Housing Act 2004.
- B. Regulatory Reform (Fire Safety) Order 2005.
- C. Fire Safety Regulations (England) 2022.
- D. Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022.
- E. Control of Substances Hazardous to Health Regulations (COSHH) 2022.
- F. L8 Approved Code of Practice (Legionella)
- G. Control of Asbestos Regulations (CAR) 2012.
- H. Gas Safety (installation and use) Regulations 1998.
- I. IEE Wiring Regulations BS7671:2008.
- J. Electricity at Work Regulations 1989.
- K. Lifting Operations and Lifting Equipment Regulations (LOLER) 1998.

FINDINGS AND RECOMMENDATIONS

Accuracy of Reporting

4.1 Accuracy and validity of reported compliance figures

- 4.1.1 We were provided with copies of 'Internal Compliance Reports' covering December 2022 to March 2023.
- 4.1.2 We reviewed source data held within Apex, Propeller, and spreadsheets (as appropriate) and used the methodologies for calculating each KPI, as undertaken by SKDC, to confirm that the percentage of compliance was reported accurately.
- 4.1.3 We were able to validate the reported figures for gas safety, electrical safety, fire safety, legionella, lift safety, smoke and carbon monoxide, and asbestos management to source data held.
- 4.1.4 The calculation of electrical safety performance is a highly manual process which involves cross referencing to multiple data sources (including contractor programmes and void lists), as well as a review of source certificate data. Currently this is performed solely by one individual, although SKDC has appointed an Electrical Safety Contract Manager who will take responsibility for compliance reporting in this area.

Recommendations

- 4.1.5 SKDC should document the process to calculate electrical safety KPIs until such a point that data is deemed more reliable and compliance can be calculated on date-related data alone.
- 4.1.8 SKDC should establish a quality assurance process to internally validate KPI figures prior to reporting.

Other Control Matters

5.1 Gas Safety

- 5.2.1 At the time of the review, Liberty Gas were contracted to complete gas servicing checks as part of the annual compliance programme and at void properties. Contract meetings with Liberty Gas should be held monthly but were held irregularly prior to the review taking place. We confirmed that Liberty Gas operatives are Gas Safe registered.
- 5.2.2 The Gas Programme is held on a spreadsheet outside of Apex and Propeller. There are plans to reconcile this data annually (which was last performed in February 2022), although this is not in line with sector practices.
- 5.2.3 Liberty have a schedule for the whole gas servicing contract and use their own system to schedule visits based on information provided by SKDC. SKDC has no access to this system directly but can access a web-based portal. This portal does not allow for a data extract to be taken so that SKDC can reconcile data held by the contractor to data in Propeller.
- 5.2.4 We understand the contract with Liberty Gas will end in 2024.
- 5.2.5 Data analysis of the varying data sets for gas safety (including the separate no access tracker) highlighted 11 properties with a boiler in Apex that does not appear in the gas programme.
- 5.2.6 Testing of no access procedures, confirmed for a sample of properties that all stages were completed, although there were delays in issuing letters. We understand that Liberty was responsible for the issuing of initial no access documentation, before passing the property to SKDC for escalation.
- 5.2.7 We were informed by Management that SKDC has a process to highlight where gas supplies are capped for an extended period of time so that temporary heaters can be provided, and these residents monitored. However, this process is not formally documented.
- 5.2.8 Discussion with Management highlighted that SKDC does not receive (or require) responsive repairs or planned maintenance contractors to complete a risk assessment (as outlined in Regulation 8 of the Gas Safety Regulations), prior to starting any works that may impact upon the integrity of the gas system and surrounding environment.

FINDINGS AND RECOMMENDATIONS

Other Control Matters (continued)

5.1 Gas Safety

5.2.9 Sample testing of void procedures highlighted one property where Liberty visited four times in a two month period. One to cap the supply at void, one to service the boiler whilst capped, one to complete a turn on and test prior to reletting, and a further annual service two months after the void period ended. Management confirmed that no request was made for a further annual service, but it was unclear if the fourth visit was in relation to a quality assurance review from CORGI requiring further work to be undertaken.

5.2.10 Whilst we confirmed that CORGI complete monthly audits of gas servicing undertaken by Liberty Gas, we were unable to ascertain that any actions highlighted by CORGI had been addressed by Liberty Gas, as these are not raised in contract management meetings during October – December 2022 (in this three-month period, 19 work failures were highlighted in CORGI audits) although we received evidence that these were raised directly with Liberty via email, and confirmed meeting minutes confirm these discussions to place in March and April 2023.

Recommendations

5.2.11 SKDC should liaise with relevant contractors for responsive and void works and request suitable risk assessments be completed prior to undertaking qualifying works.

5.2.12 SKDC should formally document the process to highlight residents without a connected gas supply and put in place suitable alternative heating methods.

5.2.13 SKDC should investigate the property outlined above to understand why multiple visits were undertaken; a monitoring process should be established to highlight further instances and raise with gas contractors as appropriate in contract management meetings. A quality assurance process should be established around certificates received so that any anomalous dates can be investigated and corrected.

5.2.14 SKDC should as part of monthly contract meetings receive assurance that CORGI quality assurance failures are addressed appropriately.

5.2.15 SKDC should increase the frequency of reconciliations of the gas programme to quarterly.

5.2.16 SKDC should as part of planned data projects, review component data within Apex and ensure that this reflects the current make up of stock.

5.3 Electrical Safety

5.3.1 Our review of SKDC's Electrical Safety Policy highlighted that it does not refer to no-access procedures, or SKDC's approach to remedial actions arising from electrical safety inspections.

5.3.2 We understand that following the self-referral to the Regulator, that a contractor, UK Gas, was brought on to retest every property's electrical installation, and that regular monthly reconciliations have been conducted to ratify programme numbers. UK Gas has gained access to 80% of stock to complete works, the remaining properties are in no-access stages and have been reported as non-compliant where data does not exist to confirm a valid inspection took place.

5.3.3 We further understand that over 50% of stock are programmed for a new inspection in the current financial year, which is anticipated to provide more reliable data.

5.3.4 We sample tested the dates of 20 EICRs as recorded in Apex, to source certificates and noted that eight properties were recorded in this system incorrectly; for three properties the date difference was between 4-6 months; the certificates were dated between May and July 2022, Apex had dates of November 2022. These discrepancies do not necessarily impact upon the accuracy of current compliance figures as the inspections are in date.

5.3.5 Data analysis of compliance data provided by SKDC identified:

- One property where the last completed date was 11/03/2105, with a deadline of 11/3/2110; we understand that this was a typo in the upload and has been addressed.
- 186 properties not scheduled for a 5-year EICR; of these eight had no future due date.

FINDINGS AND RECOMMENDATIONS

Other Control Matters (continued)

5.3 Electrical Safety (continued)

- 5.3.6 Whilst SKDC is monitoring properties with access issues, the tracker used only outlines the refusal date and a single notes column. Typically, we see trackers used that outline the dates of all attempts at access and contact.
- 5.3.7 We confirmed that there is a register for recording the due dates for portable appliance tests at all 30 sites where this has been identified by SKDC as required. Based on the data provided, all 30 sites had an in-date PAT certificate and are scheduled to next be undertaken in September 2023.

Recommendations

- 5.3.8 SKDC should update its Electrical Safety Policy to include approach to void works, approach to remedial actions, reporting arrangements and no-access processes.
- 5.3.9 SKDC should as part of planned data projects review the accuracy of EICR data to source records through either sample testing a percentage per month. A quality assurance process should be established to check input compliance data monthly. The use of data integrity tools should be investigated and configured to highlight data anomalies for investigation.
- 5.3.10 SKDC should develop a more comprehensive no-access tracker.

5.4 Fire Safety

- 5.4.1 Whilst SKDC has a Fire Safety Management Plan, our review found that it had not been updated to reflect changes required from the Fire Safety (England) Regulations and the necessary controls to ensure compliance with new requirements.
- 5.4.2 Due to the configuration of Apex by previous responsible staff within SKDC, this system is not used for monitoring the Fire Risk Assessment (FRA) programme or any remedial actions. Spreadsheets are used. No reconciliations have taken place to confirm that the spreadsheets are consistent to communal spaces in Apex or Propeller.
- 5.4.3 All FRAs in the FRA tracker are configured to an annual review; the Fire Management Policy states that General needs properties are to be reviewed every 2 years (Band B) and three years (Band A). The Fire Management Policy also references HMOs, Sheltered, Offices and buildings over four storeys; the FRA Tracker does not distinguish between these stock types.
- 5.4.4 We confirmed that there are programmes to maintain and test fire doors, emergency lighting and fire alarms and that these are consistent with the number of properties in the FRA programme. SKDC has one building over 11m, and we confirmed that a property information box is in situ, which includes building drawings, a summary of resident mobility issues and the current evacuation stance.
- 5.4.5 We confirmed that FRA remedial actions are being monitored through separate spreadsheets. At the time of the review, there were 2 high priority actions overdue, 27 medium priority actions overdue and 9 low priority actions overdue; Management confirmed that remedial actions assigned to the previous FRA contractor had historically not been completed and so a programme has been in place over the previous 10 months to clear the backlog.

Recommendations

- 5.4.6 SKDC should make a decision over the priority of FRA reviews, and update the Fire Management Policy accordingly, and reflect the frequency of FRAs accurately within the tracker (or systems as appropriate).
- 5.4.7 SKDC should establish regular reconciliations of the FRA programme to system data to ensure no properties are missed from the programme.
- 5.4.8 SKDC should review the Fire Safety Management Plan and make sure that the requirements of the Fire Safety (England) Regulations are reflected within.

FINDINGS AND RECOMMENDATIONS

Other Control Matters (continued)

5.5 Asbestos Management

5.5.1 Whilst we note that there are several process flowcharts for Asbestos Management, one of which is termed 'Asbestos Management Plan', these documents are not consistent with Asbestos Management Plans across the sector – namely, the following is not documented:

- A. Applicable legislation to which SKDC act under (e.g., CAR2012).
- B. Approach to surveys
- C. Approach to reinspection of known or presumed asbestos.
- D. Approach to remedial works / removal works.
- E. Approach to contractor appointment / management.
- F. Data management and responsibilities.
- G. Reporting arrangements.

5.5.2 Apex is currently used as the asbestos database and the Asbestos Register. However, external contractor portals are also a source of data.

5.5.3 There is a programme for SKDC operatives for asbestos awareness eLearning, and 15 officers are to be enrolled on more complex classroom training sessions.

5.5.4 Testing confirmed that for a sample of properties where asbestos has been removed that consignment notes were held by SKDC and air tests had been completed where required.

5.5.5 Risk Assessments and Method Statements are held for contractors working on asbestos.

Recommendations

5.5.6 SKDC should develop a detailed Asbestos Management Plan as outlined above.

5.6 Legionella (Water Hygiene)

5.6.1 SKDC has a Water Management Protocol, review of which references all relevant legislation, and includes responsibilities for key staff, and emergency procedures to follow in the event of a confirmed outbreak.

5.6.2 Reconciliations of the legionella programme, and any control scheme programmes (e.g., temperature checks, tank cleaning) are not undertaken at a regular frequency, or evidence of these retained. Typically, such reconciliations occur every six months to ensure that all properties are included within all relevant compliance regimes.

5.6.3 Management advised that regular contractor meetings are not established with Second Element.

5.6.4 We confirmed through sample testing that SKDC has complied with its Policy approach of review risk assessments every two years.

Recommendations

5.6.5 SKDC should increase the frequency of reconciliations of the legionella programme and supporting control scheme programmes. Evidence of reconciliations should be retained.

5.6.6 SKDC should establish regular contract management meetings and use these to monitor completion of controls scheme actions at all sites.

FINDINGS AND RECOMMENDATIONS

Other Control Matters (continued)

5.7 Lift Safety

- 5.7.1 The lift programme is monitored through spreadsheets, not systems. Reconciliations have been undertaken recently but is not established as an ongoing control. However, there are only 13 passenger lifts across SKDC stock.
- 5.7.2 It was identified during the audit that there may be stairlifts at domestic stock across SKDC. Whilst SKDC has no requirement under LOLER to maintain these lifts, if installed by tenants, there is an overarching obligation to ensure that SKDC tenants are safe. Some Registered Providers across the sector have taken the maintenance of these assets in-house to ensure that they are serviced regularly.

Recommendations

- 5.7.3 SKDC should determine where it holds responsibilities for the maintenance and inspection of stairlifts in domestic stock and put in place a programme to inspect these assets. A decision should be made whether SKDC should maintain stairlifts in private stock at Board-level.

5.8 Smoke and Carbon Monoxide Regulations

- 5.8.1 SKDC has been using stock condition data surveys and gas & electrical servicing inspections to ensure that there is a suitable (and functioning) smoke alarm and carbon monoxide alarm across its stock. A tracker spreadsheet is maintained of properties where access has yet to be granted, and an escalation process (including legal injunctions) is being followed for properties where access cannot be granted.
- 5.8.2 Guidance is in place as part of the tenant handbook to remind residents of the importance of testing these devices regularly, though this advice is due to be reviewed and reissued along with new fire safety guidance to residents in the summer of 2023.
- 5.8.3 There are processes in place to attend the same day for a repair relating to smoke or carbon monoxide alarms, even if out of hours.
- 5.8.4 There is a contractual clause in the new heating contract (following the decision to move away from Liberty Gas) which will ensure that smoke and carbon monoxide alarms are tested as part of each annual gas service.

5.9 General

- 5.9.1 Our review of the internal compliance reports noted that there were omissions when this report was compared to peer organisations in the housing sector. Namely, the following KPIs are not included:
 - A. Properties within the no-access process (separate KPIs for gas and electrical safety).
 - B. Gas compliance (communal boilers)
 - C. Number of gas services non-compliant in period but completed by time of report.
 - D. Number of electrical inspections non-compliant in period but completed by time of report.
- 5.9.2 A review of all Policies provided highlighted that none currently make reference to any controls to maintain data quality (e.g., management review, reconciliations).

Recommendations

- 5.9.3 SKDC should develop KPI reporting frameworks to include the areas highlighted above.
- 5.9.4 Policies should be updated to reference controls in place to maintain data quality.

CONCLUSION

- 6.1** Whilst we were able to validate KPIs relating all compliance areas, the process to calculate the electrical safety KPIs is not documented. There is no quality assurance process to validate both compliance data and internal reporting which may result in further reporting inaccuracies.
- 6.2** Due to a lack of confidence in data, SKDC relies on spreadsheets largely to manage compliance areas. This is a process that inherently includes more risk from a data perspective than using systems. Whilst we accept that there are plans to review compliance data across SKDC and that this includes possible new systems, the implementation of these systems can take months to complete and are only as reliable as the data which is input. We take the view that a complete review of compliance data should be undertaken, with data cleansing where necessary, prior to any system migration.
- 6.3** We highlighted several further areas for improvement in relation to gas safety, which may take time to implement, but also includes strengthening processes around data reconciliation and contractor management. Whilst we note there have been issues with contractor performance and a new contractor is likely to be procured following expiry of the contract, the processes to manage contractor performance require strengthening.
- 6.4** We note some improvements are required to manage remaining compliance areas (Fire Safety, Lift Safety, Legionella, Electrical safety, and Asbestos Management), but these are not as extensive as those raised in relation to gas safety. There are, however, thematic recommendations relating again to data quality.

APPENDIX 1: MATTERS ARISING – ACCURACY OF REPORTING

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation Through walkthrough we were able to validate the most recent KPI figures for Electrical Safety. However, the calculation of electrical safety performance is a highly manual process which involves cross referencing to multiple data sources (including contractor programmes and void lists), as well as a review of source certificate data. Currently this is performed solely by one individual, although SKDC has appointed an Electrical Safety Contract Manager who will take responsibility for compliance reporting in this area.</p> <p>Recommendations SKDC should document the methodology to calculate Electrical Safety KPIs. A quality review process should be established for all compliance KPIs, but focusing on Electrical Safety whilst the Electrical Safety Manager is calculating these figures for the initial period of their employment.</p>	<p>The methodology to be documented.</p> <p>The figures for Electrical Safety will be reviewed by the Head of Technical Services each month for the first quarter and quarterly thereafter.</p> <p>A quality review process will be implemented as part of the ongoing work to update and renew the Apex database</p>	Head of Technical Services Head of Technical Services Head of Technical Services & Health & Safety & Compliance Manager	01 August 2023 To commence 01 August 2023 01 January 2024

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation Risk assessments, accepted as good practice in relation to Regulation 8 of the Gas Safety (Installation and Use) Regulations, which are undertaken prior to works that may affect the safety of a gas system, are not completed for relevant repair and / or void works.</p> <p>For appropriate guidance, see: Staying Gas safe when working in the Built Environment LBF Guidance and Risk Assessments (igem.org.uk)</p> <p>Recommendations SKDC should liaise with relevant contractors for responsive and void works and request suitable risk assessments be completed prior to undertaking qualifying works.</p>	<p>This has been discussed with the Team Managers following the verbal feedback and the team have raised this with contractors. We are currently awaiting the documentation.</p>	Head of Technical Services	In progress
<p>Observation Tenants are required to contact Liberty Gas to have a gas supply connected at the start of a new tenancy. We identified instances through sample testing where a gas supply was not connected for over a month after the start of the tenancy.</p> <p>Whilst SKDC has a process to highlight these properties and provide temporary heating, this process is not formally documented. The formal process should cover the completion of welfare risk assessments.</p> <p>Recommendations SKDC should document the process to highlight residents without a connected gas supply and put in place suitable alternative heating methods.</p>	<p>SKDC hold a register of capped properties and will introduce a new process to review these with the Housing Team to undertake welfare checks.</p>	Head of Technical Services / Head of Housing Services	01 September 2023

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation Sample testing of void properties highlighted one instance where Liberty Gas visited a property during the void phase to conduct an annual service, without a request being made by SKDC; a further visit to conduct an annual service was made at the same property less than a month after a turn on and test. We also identified three properties where the gas supply was capped prior to the void start date based on the date recorded on certificates provided.</p> <p>The property in question was flagged to SKDC.</p> <p>Recommendations SKDC should investigate the property in question to understand why multiple visits were undertaken; a monitoring process should be established to highlight further instances and raise with gas contractors as appropriate in contract management meetings.</p>	<p>The gas monitoring process is not linked to the current housing system. Following the implementation of the new IHMS, gas and electrical safety will follow and be monitored through the IHMS as of 1/4/2024.</p> <p>This will reduce the potential for error as void properties will be visible as soon as they become void.</p> <p>In the interim, weekly lists of voids will be passed to the Compliance Administrator to ensure that the information is passed on to the Gas contractor</p>	Head of Technical Services	31 July 2023
<p>Observation Reconciliations of the gas programme are undertaken annually. Appreciating the complexity of reconciling current systems and the data project that is to commence in April 2023, sector practice sees such reconciliations undertaken quarterly.</p> <p>Recommendations SKDC should increase the frequency of reconciliations of the gas programme.</p>	<p>A system of reconciliation will be created with a documented process to be undertaken quarterly.</p>	Head of Technical Services / Compliance Manager	31 August 2023

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation Reconciliation of system data to gas programme data highlighted 11 properties with a gas boiler in Apex that management confirmed has other heating sources, or were a single room in a HMO, fed by a communal boiler and as such should not be in the gas programme.</p> <p>Recommendations SKDC should as part of planned data projects, review component data within Apex and ensure that this reflects the current make up of stock.</p>	<p>We are aware of this issue and will be undertaking changes to the recording of our boiler and other heat forms. This will run in conjunction with the implementation of the upgraded Asset Management System and bringing on the new Heating Maintenance Contractor.</p> <p>The new heating contract allows for a full stock take of the mechanical & electric assets which will be undertaken in 2024/2025. This will form the basis of updated data on our electric, gas and other heating assets.</p>	Head of Technical Services	01 April 2024
<p>Observation Our review of the SKDC Electrical Safety Policy highlighted the following omissions, typically seen in similar documents in the sector:</p> <ul style="list-style-type: none"> • Approach to void works. • Approach to remedial actions. • Reporting arrangements. • No-Access processes. <p>Recommendations SKDC should update its Electrical Safety Policy as outlined in the 'Observation'.</p>	<p>A review of the Policy will be carried out together with the other big six policies as recommended later in this report.</p>	Compliance Manager	30 October 2023

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation We sample tested the dates of 20 EICRs as recorded in the compliance data, to source certificates and noted that eight properties were recorded in systems incorrectly; for three properties the date difference was between 4-6 months; the certificates were dated between May and July 2022, system dates were November 2022.</p> <p>Furthermore, review of EICR data highlighted:</p> <ul style="list-style-type: none"> One property where the last completed date was 11/03/2105, with a deadline of 11/3/2110; we understand that this was a typo in the upload and has been addressed. 186 properties not scheduled for a 5-year EICR; of these eight had no future due date. <p>SKDC has not established a system-based exception reporting. Tools, such as PowerBI can be configured to highlight data anomalies for investigation and provide compliance figures for reporting without the need for manual intervention.</p> <p>Recommendations SKDC should as part of planned data projects review the accuracy of EICR data to source records through either sample testing a percentage per month. Data integrity tools should be established to highlight anomalies in data.</p>	<p>All data will be reviewed as we look to move this in to the new IHMS system.</p> <p>The 186 properties are the communal properties. We have reviewed the data held for these as there is some variance and not all the certificates are for a 5-year period. Over 100 of these have been reviewed and are in a programme this year to recertify.</p> <p>We will look to introduce these checks alongside property reconciliations.</p>	Head of Technical Services / Compliance Manager	01 November 2023

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation Whilst SKDC is monitoring properties with access issues, the tracker used only outlines the refusal date and a single notes column. Typically, we see trackers used that outline the dates of all attempts at access and contact. Such a tracker would be aligned with the stages of the no access process outlined in the Electrical Safety Policy.</p> <p>Recommendations SKDC should develop a more comprehensive no-access tracker.</p>	New Electrical Access tracker to be developed for new contract to be implemented in the new financial year.	Head of Technical Services / Compliance Manager	01 April 2024
<p>Observation Whilst we note that there are several process flowcharts for Asbestos Management, one of which is termed 'Asbestos Management Plan', these documents are not consistent with Asbestos Management Plans across the sector – namely, the following is not documented:</p> <ul style="list-style-type: none"> • Applicable legislation to which SKDC act under (e.g., CAR2012). • Approach to surveys • Approach to reinspection of known or presumed asbestos. • Approach to remedial works / removal works. • Approach to contractor appointment / management. • Data management and responsibilities. • Reporting arrangements. <p>Recommendations SKDC should develop a detailed Asbestos Management Plan as outlined in the observation.</p>	SKDC has a Strategic Asbestos Management Plan dated 2014. This was updated and was adopted following a meeting of Stakeholders in January 2023. The process documents form part of this plan. We will review this again as part of the overall review of all compliance policies.	Head of Technical Services / Compliance Manager	30 October 2023

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation Reconciliations of the legionella programme, and any control scheme programmes (e.g., temperature checks, tank cleaning) are not undertaken at a regular frequency, or evidence of these retained. Typically, such reconciliations occur every six months to ensure that all properties are included within all relevant compliance regimes.</p> <p>Recommendations SKDC should increase the frequency of reconciliations of the legionella programme and supporting control scheme programmes. Evidence of reconciliations should be retained.</p>	A system of reconciliation will be created with a documented process to be undertaken quarterly.	Compliance Manager	01 January 2024
<p>Observation It was highlighted during the audit that regular contract meetings with Second Element (the Legionella contractor) do not take place.</p> <p>Recommendations SKDC should establish regular contract management meetings with Second Element.</p>	Quarterly contract meetings will be established from August 2023.	Compliance Manager	01 September 2023

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation It was identified during the audit that there may be stairlifts at domestic stock across SKDC. Whilst SKDC has no requirement under LOLER to maintain these lifts, if installed by tenants, there is an overarching obligation to ensure that SKDC tenants are safe. Some Registered Providers across the sector have taken the maintenance of these assets in-house to ensure that they are serviced regularly.</p> <p>Recommendations SKDC should determine where it holds responsibilities for the maintenance and inspection of stairlifts in domestic stock and put in place a programme to inspect these assets. A decision should be made whether SKDC should maintain stairlifts in private stock at Board-level.</p>	<p>We have already started work in this area. We have identified those properties with stairlifts and other fitted lifting equipment which SKDC may be responsible for. We are currently in the process of discussions with two contractors for the delivery on an annual service and inspection.</p> <p>Following the initial inspection and maintenance we will procure a contract for the ongoing inspection and maintenance.</p>	Head of Technical Service	30 October 2023
<p>Observation We note that all FRAs in the FRA tracker are configured to an annual review; the Fire Management Policy states that General needs properties are to be reviewed every 2 years (Band B) and three years (Band A). The Fire Management Policy also references HMOs, Sheltered, Offices and buildings over four storeys; the FRA Tracker does not distinguish between these stock types.</p> <p>Recommendations SKDC should make a decision over the priority of FRA reviews, and update the Fire Management Policy accordingly, and reflect the frequency of FRAs accurately within the tracker (or systems as appropriate).</p>	<p>In 2021 all properties requiring a fire risk assessment received a full fire risk assessment by an external contractor. Since that time SKDC has undertaken a lot of work on our approach to fire safety, particularly as actions were not all completed. In 2022, all risk assessments received an on-site review to confirm which actions were complete and our focus was on the completion of more thorough compartmentation surveys which were identified as recommendations in a great number of the Fire Risk Assessments. These have been commissioned and we are now starting to develop plans for the work arising from these. Full risk assessments have been commissioned for this year.</p> <p>The Fire Management Policy will be updated to reflect the work carried out so far and our ongoing understanding of the nature of our stock.</p>	Compliance Manager	30 October 2023

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation Review of the Fire Safety Management Plan highlighted that it did not reference or include any controls in relation to the Fire Safety (England) Regulations 2022.</p> <p>Recommendations SKDC should review the Fire Safety Management Plan and make sure that the requirements of the Fire Safety (England) Regulations are reflected within.</p>	<p>We do not have any buildings classed as high rise under the guidance and only one building over 11m.</p> <p>The Fire Management Policy will be updated to reflect the controls contained in the Fire Safety (England) Regulations 2022.</p>	Compliance Manager	01 January 2024
<p>Observation Our review of the internal compliance reports noted that there were omissions when this report was compared to peer organisations in the housing sector. Namely, the following KPIs are not included:</p> <ul style="list-style-type: none"> Properties within the no-access process (separate KPIs for gas and electrical safety). Gas compliance (communal boilers) Number of gas services non-compliant in period but completed by time of report. Number of electrical inspections non-compliant in period but completed by time of report. <p>Recommendations SKDC should develop KPI reporting frameworks to include the areas highlighted in the 'observation'.</p>	<p>In line with our annual KPI reporting process, we will explore opportunities to align our reporting with Sector best practice.</p>	Acting Director of Housing	01 October 2023

APPENDIX 2: MATTERS ARISING – OTHER CONTROL MATTERS

Findings	Action Plan	Person Responsible	Timeframe
<p>Observation Our review of policies or procedures relating to the 'big six' compliance areas confirmed that there is insufficient level of detail outlining the controls in place to maintain accurate data, including quality assurance processes.</p> <p>Recommendations Policies should be updated to reference controls in place to maintain data quality.</p>	Policies will be reviewed to reference controls on Data Quality.	Compliance Manager	30 October 2023



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SKDC Compliance External Audit Action Plan

							Update							
	Item	Resolution	Priority	Responsible Person	RAG rating	Target completion date	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb
Policy														
	Gas Safety	Review policy	1	Compliance Manager	Yellow	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
	Electrical Safety	SKDC should update its Electrical Safety Policy as outlined in the 'Observation'.	1	Compliance Manager	Red	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
	Lift Safety	Review policy	1	Compliance Manager	Yellow	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
	Fire Safety	Review policy	1	Compliance Manager	Yellow	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
	Smoke and CO	Review policy	1	Compliance Manager	Yellow	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
	Asbestos Management	SKDC should develop a detailed Asbestos Management Plan as outlined in the observation.	1	Head of Technical Services / Compliance Manager	Yellow	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
	Damp and Mould	Review policy	1	Compliance Manager	Yellow	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
	Radon	Review policy	1	Compliance Manager	Yellow	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
	Water Hygiene	Review policy	1	Compliance Manager	Yellow	30 October 2023	Total Housing Compliance (THC) suite of policies to be compiled and adopted							
Procedure														
	Electrical Safety	SKDC should develop a more comprehensive no-access tracker for the new contract.	2	Head of Technical Services / Compliance Manager	Green	01 April 2024	In progress to form a part of new contract, aim is for all info to be live updated by the contractor via our online contractor portal linked to IHMS							
	Fire Safety	SKDC should make a decision over the priority of FRA reviews, and update the Fire Management Policy accordingly, and reflect the frequency of FRAs accurately within the tracker	2	Compliance Manager	Yellow	30 October 2023	In 2021 all properties requiring a fire risk assessment received a full fire risk assessment by an external contractor. Since that time SKDC has undertaken a lot of work on our approach to fire safety, particularly as actions were not all completed. In 2022, all risk assessments received an on-site review to confirm which actions were complete and our focus was on the completion of more thorough compartmentation surveys which were identified as recommendations in a great number of the Fire Risk Assessments. These have been commissioned and we are now starting to develop plans for the work arising from these. Full risk assessments have been commissioned for this year.							
	Fire Safety	SKDC should review the Fire Safety Management Plan and make sure that the requirements of the Fire Safety (England) Regulations are reflected within.	2	Compliance Manager	Yellow	01 January 2024	We do not have any buildings classed as high rise under the guidance and only one building over 11m. The Fire Management Policy will be updated to reflect the controls contained in the Fire Safety (England) Regulations 2022.							

Reconciliation												
	Electrical figures	A quality review process should be established for all compliance KPIs, but focusing on Electrical Safety whilst the Electrical Safety Manager is calculating these figures for the initial period of their employment.	1	Head of Technical Services		01 August 2023	The figures for Electrical Safety will be documented and reviewed by the Head of Technical Services each month for the first quarter and quarterly thereafter.					
	Gas figures	SKDC should increase the frequency of reconciliations of the gas programme.	1	Head of Technical Services		31 August 2023	A quarterly reconciliation programme will be introduced to reconcile data from the contractor and SK. The methodology will be documented.					
	Water Hygiene	SKDC should increase the frequency of reconciliations of the legionella programme and supporting control scheme programmes. Evidence of reconciliations should be retained.	1	Compliance Manager		01 September 2023	Bi annual reconciliation programme will be introduced to reconcile data from the contractor and SK. The methodology will be documented.					
	Stairlifts	SKDC should determine where it holds responsibilities for the maintenance and inspection of stairlifts in domestic stock and put in place a programme to inspect these assets. A decision should be made whether SKDC should maintain stairlifts in private stock at Board-level.	2	Head of Technical Services		30 October 2023	We have already started work in this area. We have identified those properties with stairlifts and other fitted lifting equipment which SKDC may be responsible for. We are currently in the process of discussions with two contractors for the delivery on an annual service and inspection.					
Methodology												
	Electrical figures	SKDC should document the methodology to calculate Electrical Safety KPIs.	1	Head of Technical Services		31 August 2023	The methodology to calculate Electrical Safety KPI's will be documented.					
Data												
	Gas programme	SKDC should as part of planned data projects, review component data within Apex and ensure that this reflects the current make up of stock.	1	Head of Technical Services		01 April 2024	The specification for the new heating contract includes an item to collect component data. Apex will be reviewed to ensure that we can collect all the data in a format that supports the robust approach to compliance. Ongoing updates to data will take place from April 2024					
	Electrical	SKDC should as part of planned data projects review the accuracy of EICR data to source records	2	Head of Technical Services / Compliance Manager		01 November 2023	Apex is not currently the main source for EICR data and is therefore not maintained. As part of the upgrade to the IHMS & Apex					
Performance												
	Gas Safety	SKDC should develop KPI reporting frameworks to include the areas highlighted in the 'observation'.	2	Acting Director of Housing		01 October 2023	In line with our annual KPI reporting process, we will explore opportunities to align our reporting with Sector best practice.					

Quality Review													
Electrical Safety	A quality review process will be implemented as part of the ongoing work to update and renew the Apex database	2	Head of Technical Services & Health & Safety & Compliance Manager		01 January 2024								
Health & Safety													
Void contractors	SKDC should liaise with relevant contractors for responsive and void works and request suitable risk assessments be completed prior to undertaking qualifying works.	1	Head of Technical Services		In progress								
Home Standard													
Gas supply/heating	SDKC should document the process to highlight residents without a connected gas supply and put in place suitable alternative heating methods.	1	Head of Technical Services / Head of Housing Services		01 September 2023	SKDC already hold a register of capped properties . These are capped at the request of tenants. Contact will be made with all those on the register prior to the colder weather and we will introduce a new process to undertake welfare checks to ensure that tenants have adequate means to heat their homes.							
Contractor Management													
Void property LGSR	SKDC should investigate the property in question to understand why multiple visits were undertaken; a monitoring process should be established to highlight further instances and raise with gas contractors as appropriate in contract management meetings.	1	Head of Technical Services		31 July 2023	Prior to go-live of the IHMS, weekly lists of voids will be passed to the Compliance Administrator to ensure that the information is passed on to the Gas contractor							
Water Hygiene	SKDC should establish regular contract management meetings with Second Element.	2	Compliance Manager		01 September 2023	Quarterly contract meetings will be established from August 2023.							

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SOUTH
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COUNCIL



Housing Overview and Scrutiny Committee

21 September 2023

Councillor Phil Dilks
Cabinet member for Housing and
Planning

HRA Capital Budget Overview September 2023

Report Author

Julie Martin, Head of Technical Services

Julie.martin@southkesteven.gov.uk

Purpose of the Report

To update the committee on the progress of the HRA Capital Programme, providing an overview of current and projected spend along with delivery updates on all associated programmes.

Recommendations

That Committee:

1. Is asked to review the contents of the report and the progress being made to utilise the HRA Capital Programme to address long term issues within our housing stock.

Decision Information	
Is this a Key Decision?	No
Does the report contain any exempt or confidential information not for publication?	No
What are the relevant corporate priorities?	Housing that meets the needs of all residents
Which wards are impacted?	All

1. Implications

Taking into consideration implications relating to finance and procurement, legal and governance, risk and mitigation, health and safety, diversity and inclusion, safeguarding, staffing, community safety, mental health and wellbeing and the impact on the Council's declaration of a climate change emergency, the following implications have been identified:

Finance and Procurement

1.1 The financial implications are included within the report.

Completed by: Alison Hall-Wright, Assistant Director of Finance and Deputy S151 Officer

Legal and Governance

1.2 There are no significant legal or governance implications arising from this report which is to note an update on the HRA Capital Programme.

Completed by: Graham Watts, Assistant Director of Governance and Monitoring Officer

2. Background to the Report

- 2.1 The Council has a clear commitment in its Corporate Plan 2020-2023 to provide "Housing that meets the needs of all residents" and the timely delivery of improvements to its social housing stock. The HRA Capital Programme is the funding stream that delivers capital improvements to the council's housing stock. This covers all aspects of capital expenditure from improvements such as, Kitchens, Bathrooms, Doors, Windows, Re-wires etc as well as our new build programme and acquisitions.
- 2.2 The capital programme for 2023/24 includes the budget lines for two large programmes taking place in the District, the Earlesfield programme delivering improvements and important asbestos removal works to 152 properties on the

Earlesfield estate and the SHDF (Social Housing Decarbonisation Fund) which is a match funded programme delivering energy efficiency works to 332 properties across the District.

2.3 The original budget set for the period 2023/24 was £18.497m, since this budget was set, we have made two amendments to the budget to enable the council's contribution to the LAHF programme (Local Authority Housing Fund) taking the total Capital programme to £24.649m. The current budgets can be seen in table 2, with the budget amendments shown in table 1.

2.4 Table 1 current budget amendments as at the 31 July 2023.

Table 1 – HRA Capital Programme Budget Adjustments

Date of Approval	HRA Budget amendment	£'000
		18,497
March 2023	Local Authority Housing Fund	4,483
July 2023	2022/23 Budget Carry Forwards	1,669
Total		24,649

2.5 Table 12 shows the significant forecast variances for the HRA capital schemes for 2023/24 as at the 31 July 2023.

Table 2 – HRA Capital Forecast Outturn Position

Capital Scheme	2023/24 Original Budget £'000	2023/24 Current Budget £'000	2023/24 Forecast spend £'000	Forecast Variance £'000
Energy Efficiency	5,398	5,474	4,398	(1,076)
ICT	470	740	630	(110)
Purchase of Vehicles	0	81	45	(36)
New Build Programme	4,500	4,500	4,500	0
Refurbishment & Improvements	8,129	13,854	12,043	(1,811)
Total Expenditure	18,497	24,649	21,616	(3,033)

2.6 Table 3 shows the significant forecast variances for the HRA capital schemes for 2023/24 as at the 31 July 2023.

Table 12 – HRA Capital – Significant Variances

Explanation of Significant Variances	£'000
Heating & Ventilation Heating replacements are underway with approximately 35 being completed to date and a further 200 gas heating systems programmed with the contractor. Engagement has commenced with Eon regarding the SHDF bid which will see a further circa 100 heating system improvements delivered by the end of March 2024.	(1,076)
Housing System Enhancements The contract has been varied with the supplier resulting in significant reduction in contract costs. The proposed go-live is November 2023.	(110)

Kitchen Refurbishments We have completed circa 40 kitchens with a further 40 in programme. In progress of procuring a new contractor to work alongside an existing one in order to meet demand. Full spend is dependent on the timely appointment of an additional contractor.	(248)
Bathroom Refurbishments We have completed around 35 bathrooms to date. In progress of procuring a new contractor to work alongside an existing one in order to meet demand. Full spend is dependent on the timely appointment of an additional contractor.	(248)
Passenger Lifts The new lift installation at Church View is now complete and works have commenced at Riverside. A further 6 lifts have been identified for replacement and we are working on procurement of a contractor to deliver. Due to the lead in time of materials it is unlikely that all of these installations will be completed in this financial year.	(580)
Re-roofing The annual estimated programme is to replace 112 roofs, 2 have been fully completed at this time with a further 4 properties at the quotation stage. We are in progress of procuring a new contractor from framework to complete the delivery of this programme due to our previous contractor withdrawing from the contract at short notice.	(369)
Re-wiring 267 re-wires have been budgeted for, currently around 160 have been programmed in with contractors across the Earlesfield programme and a separate rewire programme. To date 13 have been completed and works have commenced on the rewire programme.	(166)
External Wall Finishes The budget will allow improvements to around 35 properties based on the current cost estimates. We have identified 31 properties for improvement. Engagement has commenced with Eon regarding the SHDF bid which will see improvements delivered by the end of March 2024.	(200)
Repairs Vehicles Rescheduling of programme to 2024/25	(36)

3. Key Considerations

- 3.1 The capital programme has been informed and planned utilising the data from the stock condition programme to ensure that the council are making data informed decisions.
- 3.2 The council are on track to deliver the largest capital programme spend for a number of years. This is despite several contractors having to be sourced to enable delivery and completion of works.
- 3.3 The majority of the current projected underspend of £3.033m is in relation to the two-year SHDF (Social Housing Decarbonisation Fund) programme and the Earlesfield programme, all capital funds shall be carried forward to the following year to enable full budget spend and programme completion.

4. Reasons for the Recommendations

4.1 Report is for review and discussion.

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SOUTH
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COUNCIL



Housing Overview and Scrutiny Committee

21 September 2023

Councillor Phil Dilks
Cabinet member for Housing and
Planning

Earlesfield Project Overview September 2023

Report Author

Julie Martin, Head of Technical Services

Julie.martin@southkesteven.gov.uk

Purpose of the Report

To update the committee on the progress of the Earlesfield Project, providing an overview of the project position, completed works and projected timescales.

Recommendations

That Committee:

1. Note the contents of the report and the progress being made to deliver on the Earlesfield Project to resolve long standing issues within our housing stock.

Decision Information	
Is this a Key Decision?	No
Does the report contain any exempt or confidential information not for publication?	No
What are the relevant corporate priorities?	Housing that meets the needs of all residents
Which wards are impacted?	All

1. Implications

Taking into consideration implications relating to finance and procurement, legal and governance, risk and mitigation, health and safety, diversity and inclusion, safeguarding, staffing, community safety, mental health and wellbeing and the impact on the Council's declaration of a climate change emergency, the following implications have been identified:

Finance and Procurement

- 1.1 The budget required to complete the works associated with the Earlesfield Project is included in the approved 2023/24 Revenue and Capital budgets.

Completed by: Alison Hall-Wright, Assistant Director of Finance and Deputy S151 Officer

Legal and Governance

- 1.2 There are no significant legal and governance implications associated with this report which is to note progress made on the project.

Completed by: Graham Watts, Assistant Director of Governance and Monitoring Officer

2. Background to the Report

- 2.1 The Council has a clear commitment in its Corporate Plan 2020-2023 to provide "Housing that meets the needs of all residents" and the timely delivery of improvements to its social housing stock, which includes a significant number of properties on the Earlesfield Estate in Grantham, is a key element to this.
- 2.2 The Earlesfield Estate contains 1014 Council-owned properties, of which 152 are "Wimpey No Fines" design, a post-war non-standard construction archetype. In 2021, the Council identified as part of its landlord responsibilities that these property types contained asbestos containing material (ACM). Although not presenting an immediate risk of harm to residents, it is best practice to remove

ACM. It is confirmed that there are no other properties in the Council's housing stock of this archetype.

- 2.3 In May 2022 it was agreed for the project to be completed by a contractor, United Living. As part of this delivery there are monthly contract monitoring meetings and quarterly meetings with our contractors that are attended by the Council's Chief Executive. There is also an on-site dedicated office where our operational staff linked to the project are based.
- 2.4 There have been site visits undertaken to completed properties by the Leader, Cabinet Member and the ward members. Appendix 1 – pictures after completion of works.
- 2.5 Each property has a bespoke specification setting out the major elements of works required. The works will include where needed, replacement of major components such as the kitchen, bathroom, heating system, electrics and windows. Appendix 2 – Programme of properties completed and scheduled to include the scope of works undertaken is indicative of the works undertaken as of the 8th of September 2023.
- 2.6 To date we have completed 19 property refurbishments. This represents a slower than anticipated project delivery resulting in the need for us to extend the contract to enable the completion of all properties.
- 2.7 There have been several factors which have introduced unforeseen delays into the contract and the most significant of these is the process to identify and safely remove the asbestos containing material. Whilst surveys and planning were undertaken prior to the project, discussions held with the HSE (Health & Safety Executive) in terms of the planning of this project at delivery stage, identified that testing of some of the material in the property could only be done once the tenants had been decanted. The impact of this is delays of up to 3 weeks per property to survey and submit the paperwork to the HSE.
- 2.8 The original scope of works did not include replacement of the windows, however the emerging strategy to improve energy efficiency in the Council's property stock prompted a revisit of this decision and the scope was widened to include windows so that full property refurbishment was achieved.
- 2.9 To mitigate the delays, we are extending the number of properties available as decant properties and working with tenants to consider their needs and offer alternative properties as a direct let where this meets the provisions of the Allocations Policy. This is enabling us to make best use of our housing stock and enable several downsizing opportunities to existing tenants releasing much needed family accommodation.

- 2.10 The flexibility now operating within the project has improved property turnaround and achieved better outcomes for tenants and we have identified further voids on the Earlesfield Estate and are increasing the number of decant properties available to United Living from 10 to 18.
- 2.11 United Living will be carrying out the void works and bringing these into the overall programme to enable the number of properties achieving completion to be increased. The overall effect of the delays despite the mitigations, means that the programme will look to complete by the end of April 2025.
- 2.12 The Council is currently in the process of formalising the changes to contract with United Living and the cost of additional works not included in the original scope of work have been allocated from the Windows and Doors Capital budget.

3. Key Considerations and Other Options Considered

- 3.1 Careful consideration was given as to the inclusion of the windows, however it was agreed that the tenants will go through significant upheaval on this project to accommodate the work and inclusion of the new windows would minimise further disruption in the future. It is anticipated that the Council will achieve greater tenant satisfaction in the finished project and meet its strategic objectives through the inclusion as part of the project scope.
- 3.2 There were originally 10 decant properties allocated to the project and with the delays in survey and asbestos remediation, to continue with the same number of decant properties would result in a programme extending well beyond April 2025.

4. Reasons for the Recommendations

- 4.1 Report is for information and noting.

5. Appendices

Appendix 1 – Pictures after completion of works

Appendix 2 – Programme of properties completed and scheduled

Appendix 1

Appendix 1 – Pictures after completion of works













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Housing Overview and Scrutiny Committee

21 September 2023

Councillor Virginia Moran
Chair of Housing Overview and
Scrutiny Committee

Voids Workshop Overview September 2023

Report Author

Julie Martin, Head of Technical Services

 Julie.martin@southkesteven.gov.uk

Purpose of the Report

To update the committee on the recent voids workshop and the future plans.

Recommendations

That Committee:

1. Note the contents of the report and recommendations for future workshops.

Decision Information	
Is this a Key Decision?	No
Does the report contain any exempt or confidential information not for publication?	No
What are the relevant corporate priorities?	Housing that meets the needs of all residents
Which wards are impacted?	All

1. Implications

Taking into consideration implications relating to finance and procurement, legal and governance, risk and mitigation, health and safety, diversity and inclusion, safeguarding, staffing, community safety, mental health and wellbeing and the impact on the Council's declaration of a climate change emergency, the following implications have been identified:

Finance and Procurement

1.1 There are no financial implications associated with this report.

Completed by: Alison Hall-Wright, Assistant Director of Finance and Deputy S151 Officer

Legal and Governance

1.2 There are no significant legal or governance implications arising from this report which is to provide the Committee with an update on the outcomes of a recent workshop.

Completed by: Graham Watts, Assistant Director of Governance and Monitoring Officer

2. Background to the Report

- 2.1 The Council has a clear commitment in its Corporate Plan 2020-2023 to provide "Housing that meets the needs of all residents". A key aspect of a landlords performance is the way in which it manages properties whilst they are void.
- 2.2 At the inaugural meeting of the Housing Overview and Scrutiny Committee the chair identified the opportunity to complete a void workshop which could be attended by all members.

- 2.3 The Void Workshop took place on the 29th of August 2023 at 2pm. The session was attended by The Acting Director of Housing, the Head of Technical Services, The Head of Housing and the Voids and Responsive Repairs Surveyor.
- 2.4 The session was run over a two-hour period with sixteen Councillor's in attendance.
- 2.5 The team delivered a comprehensive presentation to members and provided an overview of the;
 - A: Void Workflow/Process
 - B: Void Policy and Re-let standard
 - C: Performance
 - D: Void team following restructure
 - E: Examples of property condition
 - F: Void inspection and works packages

The team also highlighted the current pressures and mitigation that was being used to improve the current performance.

- 2.6 The workshop was well received with comprehensive questions asked by members throughout, enabling an enhanced understanding of the process undertaken and the pressures being faced by the team.
- 2.7 Appended to this report is a copy of the presentation utilised in the workshop together with the Void Policy, Re-let standard and Void Workflow and a copy of the Q&A responses.

3. Key Considerations

- 3.1 The workshop provided a platform to enhance members understanding of the operational pressures being managed by the Housing team.
- 3.2 That a future workshop be arranged to cover the 'Homelessness and Housing Register' aspects of work.
- 3.3 That a programme be compiled for future workshops by the Chair of the committee.

4. Reasons for the Recommendations

- 4.1 Report is for information and noting.

5. Appendices

- Appendix 1 – Void Workshop presentation
- Appendix 2 – Voids Policy 2022-25
- Appendix 3 – South Kesteven Void Quality Standard
- Appendix 4 – Voids Workflow SKDC
- Appendix 5 - Member Void Workshop Q&A Document August 2023

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Housing Directorate

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Void Workshop for Members

August 2023



Appendix 1



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Contents of Presentation

- Section 1: Welcome from Acting Director of Housing and Team
- Section 2: Overview of what is a void and minor / major definitions.
- Section 3: Void Policy
- Section 4: Void Standard and Procedure
- Section 5: The Void Team and Phases of Work
- Section 6: SKDC Performance Overview

- Question & Discussion Time

Welcome and Introductions

- Craig Spence – Acting Director of Housing
- Julie Martin – Head of Technical Services
- Jodie Archer – Head of Housing Services
- Jim Tuck – Voids & Responsive Repairs Surveyor

What is a Void Property?

- A void property is when a property becomes vacant and no longer let to a tenant.
- **Minor Works**
 - Completed by our team in-house.
 - Day to day repairs including light fitting replacement, replacing broken door furniture, replacing internal doors, rehanging doors, minor electrical and plumbing activities, some decorations and matters of a similar small scale.
- **Major Works**
 - Completed by external contractors.
 - This includes replacement of elements of the property such as windows, kitchen and/ or bathroom, new doors and rewiring.



Void Policy

- Brief overview
- Key points:
 - Pre-Termination process
 - Tenant Responsibilities & Recharges
 - Improved relet standard
 - Enhanced tenant satisfaction and ownership
- Link to the Policy – [here](#) and printed copies are available.



Void Standard and Procedure

- Key points from the new standard:

- ✓ Security – the team check and renew all locks.
- ✓ Electrics – electrical inspection and certificates, ensuring working mains smoke and carbon monoxide detectors
- ✓ Gas – gas safety check, provide safety certificate and carry out any necessary repairs.
- ✓ Asbestos – Checks and removals where required
- ✓ Smoke Alarms & Carbon Monoxide Detectors
- ✓ DNO Electric Isolators
- ✓ Plumbing – flush all systems and all items working or repaired
- ✓ Heating – systems working properly and valid energy performance certificate.
- ✓ Damp – inspections for damp and mould, treatment and works



Void Standard and Procedure

Continued

- ✓ Kitchens & bathrooms – ensure all facilities are working, with electric points in the kitchen and toilet seats replaced.
- ✓ Roof & outside maintenance
- ✓ Doors, windows & stairs – ensure all in good working order
- ✓ Walls & Ceilings – plasterwork checked, wallpaper removed if damaged and repairs carried out
- ✓ Floors – Non slip to Kitchen and Bathroom only
- ✓ Decoration – Kitchen and Bathroom only, Decoration allowance
- ✓ Aids & Adaptations – always checked
- ✓ Garden – Tidy and make safe

- Link – [here](#) and printed copies are available.



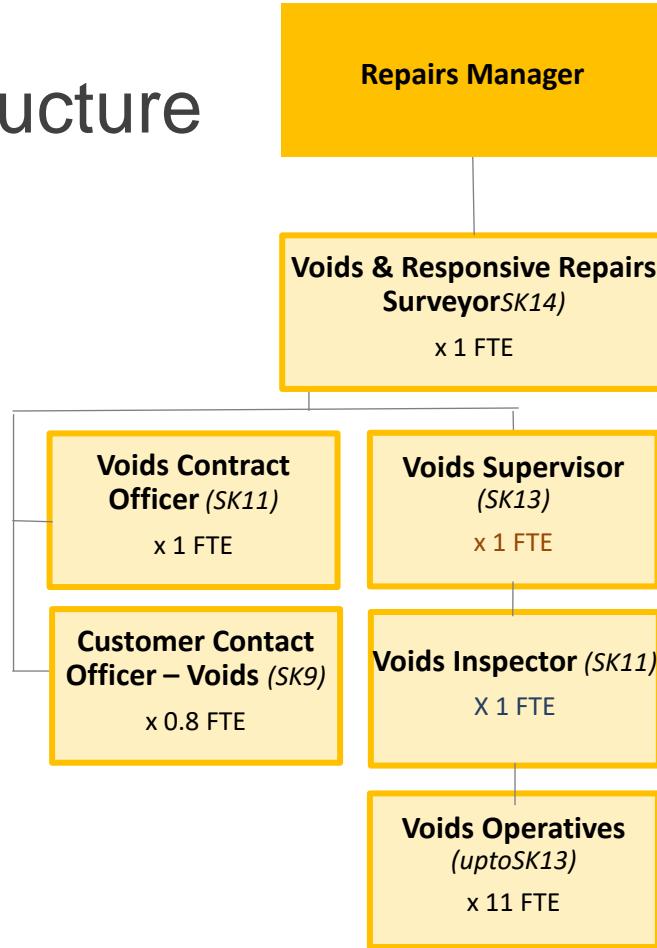
The Void Team and Phases of Work

- Void team structure
- Phases of work - internal workflow
- Examples of property when received and when returned
- Non-standard voids, DDA, Conversions, Structural, Decants

The Void Team and Phases of Work

- Void team structure

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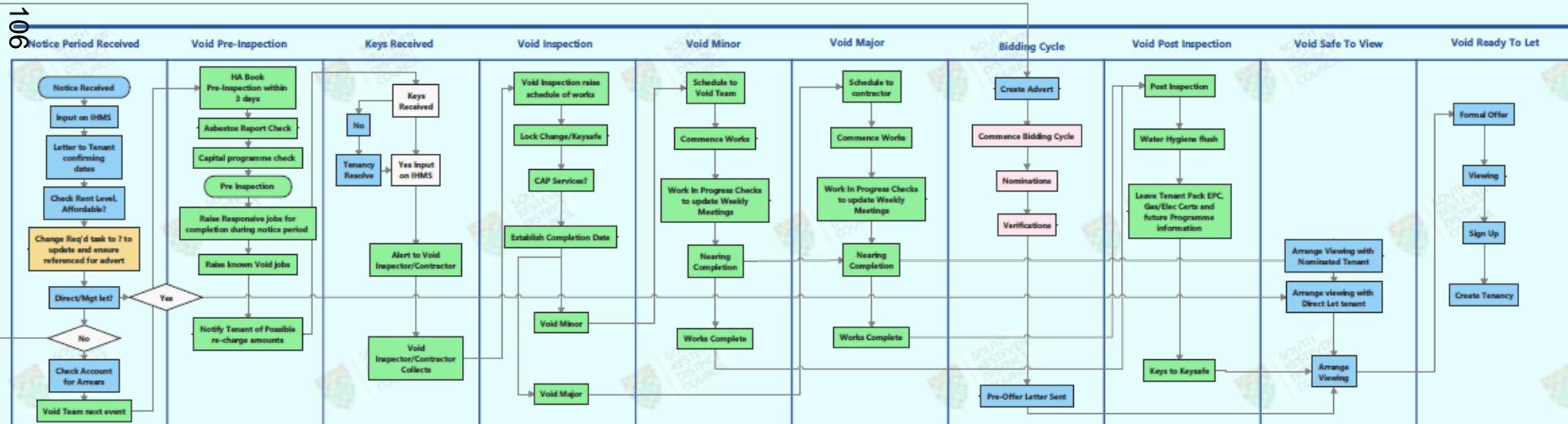


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The Void Team and Phases of Work

- Workflow

[SKDC Void Workflow](#)



The Void Team and Phases of Work

- Post check pictures



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SKDC Performance Overview

- 22/23 dashboard
- Current dashboard
- Contractor pressure / mitigation
- Ambition

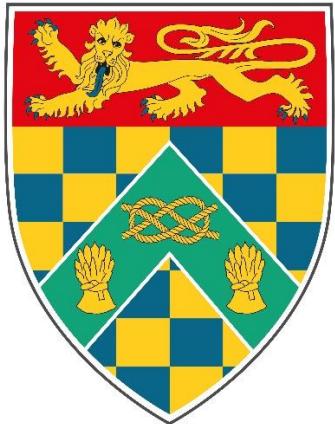
Question & Discussion Time

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**South Kesteven District Council
Voids Policy
2022 – 2025
January 2022**

(1) Policy Summary

1.1 This Policy details South Kesteven District Council's approach to managing void properties with the goal of:

- Delivering a clean safe and secure property to incoming tenants, within our targets for turnaround times, standard and cost.

(2) Introduction

2.1 A property is Void in the period between tenancies.

2.2 Voids are vacant properties and therefore no rent is being paid. This results in a loss of income for The Council. Therefore, we aim to minimise this loss by ensuring that a property is let to the right applicant as quickly as possible.

2.3 The Council aims to let every property to a household which is the best match for that property in order to meet the households current, and where possible, future needs. Although one of the Council's aims is to minimise rent loss, we will also seek to maximise the best match for the property through the allocations process.

3. Policy Scope

3.1 This policy applies to all properties held by the Council within its Housing Revenue Account and is triggered by a tenancy ending and it being appropriate for the Council to re-let the property.

3.2 This Policy will ensure compliance with current legislation, promote good practice, ensuring consistency of approach and has regard but is not limited to:

- Regulator of Social Housing's: Home Standard
- Current Gas and Electrical safety requirements
- All current Landlord Health and Safety requirements
- Ensures value for money in void property works
- Achieves the minimum property quality standard through application of the re-let standard
- Achieves high levels of customer satisfaction with the overall allocation process and property condition
- Is consistent with the aims of our corporate plan

3.3 This Policy applies to all aspects of void management.

4. Policy Objective

4.1 This policy is designed to meet the following key themes in the Council's corporate plan:

- Housing that meets the needs of all residents
- Healthy and Strong Communities
- A Clean and Sustainable Environment
- A high performing Council

5. Policy Delivery

5.1 The operational delivery and monitoring of this policy is the responsibility of the Head of Housing Services and Head of Housing Technical Services.

5.2 The Council's staff involved in the void process have a responsibility to ensure that this policy is applied.

5.3 Properties will be re-let in accordance with the Council's:

- Allocations and lettings policy
- Void's policy and relet standard
- Chargeable policy
- Asset management strategy
- Compliance policies and procedures
- Financial standing orders

6. Tenancy Sustainment

6.1 The Council will seek to minimise unnecessary voids through:

- Effective tenancy management
- Financial inclusion advice
- The installation of aids & adaptations so that tenants and their families can remain in their home where economically viable in accordance with the Aids & Adaptations policy
- Signposting tenants to the relevant resources for the provision of housing support

6.2 The Council will record reasons as to why properties have become empty and will undertake regular root cause analysis to identify if the void could have been avoided. If the void could have been avoided, the Council will take action to minimise the potential for this happening again in future.

7. Repairs and Improvements

7.1 Repairs and improvement work are often the main factor for a delay in the re-letting of void properties. Therefore, the Council will have a void quality standard (SKVQS) detailing the standard required to let a property (see

appendix 1). This SKVQS addresses the key principles of safety, security, cleanliness and repair. This is not an improvement standard and therefore improvement work will be undertaken after the new tenant has moved in, and only prior where a repair is not viable.

- 7.2 Where prospective tenants have specific requirements in order to occupy a dwelling, and these are not included within the relevant void standard, then approval should be sought from the Head of Technical Services or the Head of Housing Services.
- 7.3 The Council will utilise their Housing IT systems to efficiently manage the void process from start to finish.
- 7.4 Aids and adaptations which are essential to make the property habitable for a new tenant or their family will be carried out prior to the property being let. A cost benefit analysis shall be undertaken with any decision being taken by the Head of Technical Services, Head of Housing Services in consultation with the Assistant Director of Housing.
- 7.5 Improvement work will normally be undertaken after the new tenant has moved in. If a repair is not viable then improvement work can be undertaken at the void stage

8 Tenancy Termination - Tenant Responsibilities

- 8.1 All tenants will be required to comply with the terms of their tenancy agreement, including providing 28 days' notice of their intention to terminate their tenancy. A shorter period may be agreed, but this is subject to agreement by the Head of Housing Services.
- 8.2 Tenants must leave the property in an acceptable condition, subject to fair wear and tear. Where this is not the case, the Council will recharge outgoing tenants for any repairs required to the property which are due to tenant damage, disrepair or neglect, for changing locks or replacing keys if not returned, and for the cost of removing rubbish, furniture or personal belongings. Further guidance is detailed within the Council's chargeable policy.

9 Voids – The Council's Service Commitment

- 9.1 We will ensure that prospective tenants are kept fully informed about the commencement date of their tenancy.
- 9.2 We will ensure that all void properties are brought up to our current SKVQS (appendix 1) prior to being let to the new tenant.
- 9.3 All new tenants will be surveyed to ensure that they were happy with the allocations process and standard of their new home. The results of these surveys shall identify and inform continuous improvement opportunities.

9.4 We will actively monitor our allocations and voids processes to minimise the period our properties are empty, so that they are available for letting to prospective tenants as quickly as possible.

10. Performance Management

10.1 All activities within the Void Policy will be subject to continual performance monitoring.

10.2 Key performance targets (KPIs) will be reviewed annually. KPIs will be reported to the Council's senior housing team, committee, cabinet and periodically to our tenants.

10.3 Periodic audits will be undertaken by the heads of service to ensure compliance with the contents of this policy.

11. Complaints and Appeals

11.1 All complaints regarding the service received will be dealt with in-accordance with the Council's complaint procedure.

11.2 All appeals regarding the allocation of a property will be heard in-accordance with the Allocations policy.

12. Other languages and Formats

12.1 This policy will be made available in other languages and other formats on request.

13. Policy Review

13.1 The policy will be reviewed every 3 years or sooner if required, for example changes in statutory or regulatory requirements.

POLICY & PROCEDURE CONTROL (TO BE INCLUDED AT THE END OF ANY POLICY AND/OR PROCEDURE)	
TITLE:	Void Policy
AUTHOR:	Craig Spence Assistant Director of Housing
VERSION:	1
APPROVED BY:	
DATE APPROVED:	
REVIEW DATE:	

South Kesteven Void Quality Standard - SKVQS

What you can expect in your new home

We want to make sure we deliver a clean, safe and secure property to incoming tenants, within our targets for turnaround times, standard and cost. All our properties should meet our 'property standard'. Here's what our standard covers:

Security

We will:

- Renew locks to all lockable doors, including any outbuildings.
- Check any other security measures like window locks are working properly and give you the keys.
- Provide any communal entrance fobs or keys that are required.
- Where a Tunstall system is installed we shall ensure it is operational and upgrade the unit if required.

Electrics

We will:

- Carry out an electrical inspection, provide an electrical safety certificate and complete any necessary repairs to make sure electrical fixtures and fittings are safe.
- Ensure the property has a working mains smoke and carbon monoxide detector system as well as heat detector.
- Install 24-hour trickle fans or a Positive Input Ventilation (PIV) unit depending on property requirements and upgrade if required.
- Provide a minimum of x1 double USB socket in bedrooms, living room and kitchen in addition to standard sockets.

Gas

We will:

- Undertake a gas safety check, provide safety certificate and carry out any necessary repairs.
- Arrange for a turn on and test of the gas once the tenant is in situ.

Smoke Alarms and Carbon Monoxide Detectors

We will:

- Adequate numbers of smoke alarms will be fitted, and Carbon Monoxide Detectors where required.
- Where these are provided, they will be checked and serviced.

Plumbing

We will:

- Flush all systems to minimise the risk of Legionella and ensure there is hot and cold running water, and all taps are working properly.
- Check all accessible pipe work and tanks for leaks and blockages and carry out any repairs as necessary.
- Install a Surestop valve to the mains water supply.

Heating and energy efficiency

We will:

- Make sure the heating system is working properly.
- Provide a valid energy performance certificate.

- Provide advice and/or guidance on operation of heating system.

Damp

We will:

- All properties will be free from damp.
- The Council will ensure an exhaustive inspection whenever damp or mould is present and will undertake whatever works are needed, e.g., upgrading fans and ventilation

Kitchens

We will:

- Make sure the kitchen is adequate and has:
 - A kitchen sink unit with cupboard underneath
 - An electric cooker point
 - An electric point for a fridge freezer
 - At least two usable cupboards
 - Adequate work surface
 - Space and plumbing for a washing machine (unless communal facilities are provided)
 - A minimum of three rows of splashback above the cooker

Bathrooms

We will:

- Make sure all toilets, showers, baths, sinks and taps are working properly.
- Fit an electric shower
- A minimum of three rows of splashback around the sink and full height tiling in shower
- Ensure all sealant around baths, basins and sinks is in good condition.
- Remove any existing shower curtain where present and/or replace with new.
- Replace all toilet seats.

Roofs, guttering & outside maintenance

We will:

- Ensure the property is wind and weather-proof
- Clear the loft of any rubbish and ensure the fire break is intact.
- The loft hatch is to be fitted with a suitable Fire Brigade lock so that it is kept out of use.
- Check rain-water goods are in good condition and clear any blockages or make repairs if necessary.
- Remove any outbuildings or structures which are not safe.
- Ensure any outbuildings are in good condition and watertight.
- Provide an outside light at front of property.

Doors, windows & stairs

We will:

- Make sure all doors are in good working order and that any glass panels in doors and side panels meets current safety standards
- Make sure all windows and locks are in good working order and reseal any gaps around the windows.
- Replace any blown or cracked double glazed units.
- Check that staircases, banisters and balustrades are secure and safe
- Make sure there are curtain battens fitted above all windows.

Walls & ceilings

We will:

- Check the plasterwork on exposed walls and ceilings is in good condition and repair/replaster where condition is poor.
- Strip wallpaper where damaged or where it is suspected that walls underneath may be damaged.
- Remove all polystyrene ceiling tiles and skim coat plaster repair over area of removal if required.
- Mist coat emulsion paint to walls where wallpaper has been removed or to all newly plastered surfaces.
- Ensure that where signs of damp are identified we will treat it.

Floors and floor coverings

We will:

- Remove any fitted carpets and floor coverings, except any non-slip flooring to kitchen and bathroom which is in good condition.
- Install non-slip flooring to kitchen and bathroom if not present.
- Secure and/or repair any loose or broken floorboards.
- Ensure that your flooring is level and safe allowing you to fit the floor covering of your choice.

Decoration & cleaning

We will:

- Offer you a decorating allowance for some rooms if they are in a poor condition.
- Ensure all surfaces, including woodwork are free of flaking paint and ready for decorating.
- Remove any graffiti
- All floors and stairs will be swept and wet mopped where possible.
- Bathroom and WC floors will be disinfected.
- All doors (internal and external), doorframes, windows, window frames, windowsills, skirting boards, radiators, and pipe works will be washed down and wiped cleaned.
- Cobwebs will be removed from all areas.
- All sinks, basins, taps, tiled areas, and showers will be cleaned and sanitised.
- Kitchen units, including all work surfaces, cupboards and drawers will be cleaned and sanitised internally and externally.
- All toilets and pipe work will be cleaned.
- If the property shows signs of vermin or insect infestation, then fumigation or other appropriate treatment will take place. Prior to this becoming the tenant's responsibility from commencement of tenancy.

Aids and Adaptations

We will:

- These will be left in situ unless instructed to remove. All aids and adaptations will be checked, and repairs undertaken as necessary to ensure they are safe to use.

Gardens

We will:

- Clear the garden of any rubbish.
- Ensure grass and hedges are cut where necessary
- Fill or remove any garden ponds
- Ensure fencing that borders a public space is in good condition and that all other boundaries will be marked by at least post and wire.

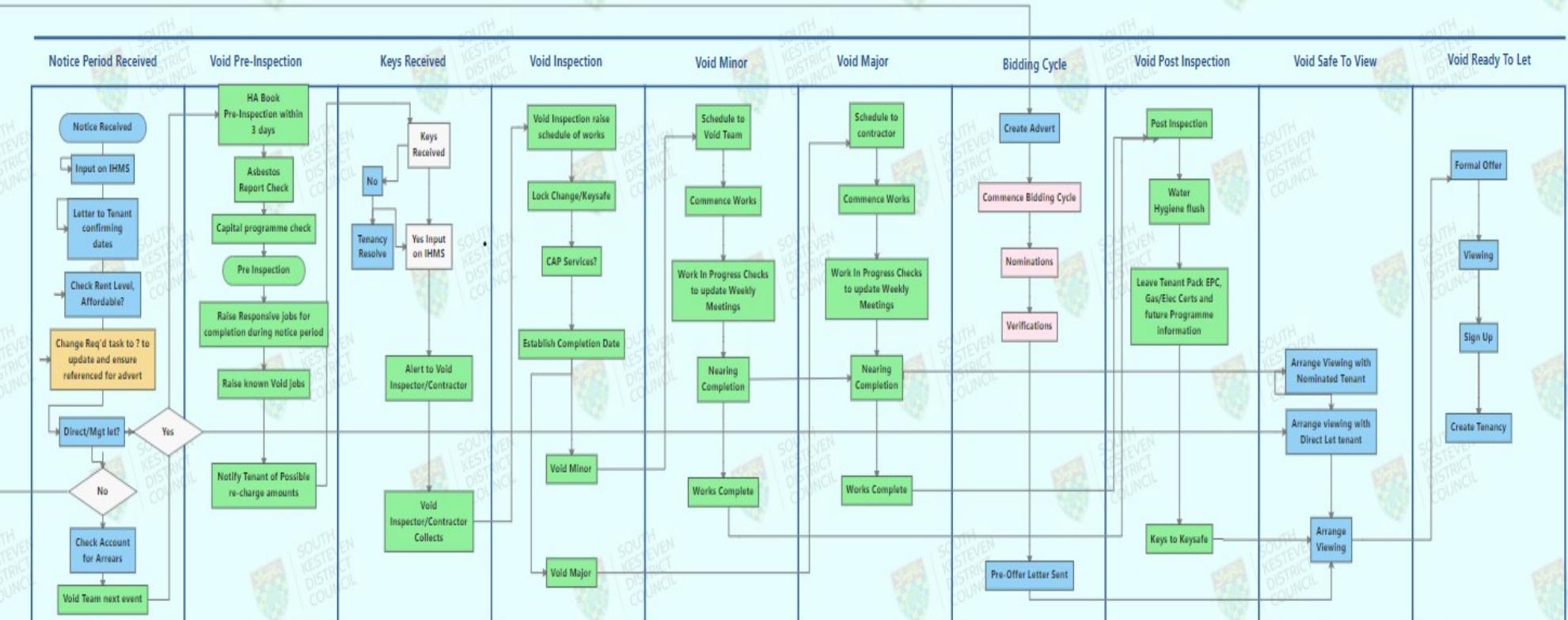
- Ensure that paths leading to main doors are free from trip hazards.

General maintenance and future upgrades

We will:

- Inform you of any works due to be carried out at your property within the following 12 months.
- Check the property for asbestos and where it is identified it will either be removed or left in a safe condition.
- Not all repairs will be carried out before re-letting. Some repairs may be completed once the incoming tenant has moved in. These will be repairs that wouldn't prevent the tenant from living in the property.
- The new tenant will be advised of any outstanding work during viewing and/or during sign-up. New tenants will be asked to sign an acceptance form that confirms the property is of an acceptable standard, with any repairs due after re-let clearly noted.

SKDC Void Workflow



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Void Workshop Aug 2023 questions and responses

Question	Response
Can we have a quarterly report on the progress of voids?	That can be agreed through the Chair as a recurring item at Housing O&S, void turnaround shall be reported as a KPI in standard council performance reporting.
What are the main reasons for voids?	The main reason for a tenancy to end is death of the tenant
If issues are around repair can SKDC employ apprentices to help them train and in the meantime SKDC gets more voids upgraded?	We are actively seeking to employ apprentices, but obviously with apprentices comes the need for training and supervision and the ability to learn from an established tradesperson, this is the area that we are currently finding it difficult to recruit to.
If a property is habitable and would be empty for more than 3 months waiting upgrade repairs would it not make sense to allow someone to move in and then upgrade the property rather than leave them inadequately housed, or, give the choice to the tenant – take it as it is or wait as long as it takes to get repaired/upgraded?	Where we have for example a kitchen that is nearing the end of its life and is useable and does not present as a hazard this is something that we already look to do. We do not give the tenant the choice but we make those decisions.
Can an additional void session be held for those members unable to attend the original meeting	To be discussed at Housing O&S in September
Is our voids standard too high?	The void standard is in line with best practice and has resulted in eradicating complaints with regard to property condition at sign up.
Are our heating/EPC ratings options too ambitious?	Our ambition is to move all properties to at least an EPC 'C' rating which is the minimum requirement in future years to enable the letting of properties.
What proportion of the budget is spent on voids?	To be confirmed
How is the contractors time on repairs/ improvements divided?	The Council has specific contractors dealing solely with Void properties.
What improvements in contractual obligations have been made?	We have split the District North and South to aid contractor resource planning and reduce travel time, all voids are completed to our void quality standard.
When residents are relocated for significant works to take place, why are the timescales given so often awry?	We have recently had some very complex cases, for instance the replacement of a roof and associated timbers the extent of work is not always known until the work commences, some of our older/listed stock requires bespoke creation of roof trusses etc which adds further timelines to the project.
Lack of timescale for a void despite the increased need.	This is in the process of being addressed, we meet weekly to discuss voids and the timelines for their completion and return. There are some properties that we hold due to knowledge that they will be hard to let or may be possible properties for future disposal due to the extent of work required.

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Housing Overview and Scrutiny Committee

21 September 2023

Report of Councillor Phil Dilks
Cabinet Member for Housing and
Planning

Review of Fees Policy for Licensing of Mobile Homes

Report Author

Ayeisha Kirkham, Public Protection Manager

 ayeisha.kirkham@southkesteven.gov.uk

Purpose of Report

The Council is required to publish a policy if it is to charge for the licensing of mobile home and caravan sites. The Council has an existing policy and the fees are reviewed on an annual basis to set the fees for the next financial year. This is to reflect the true costs of the licensing process that the Council incurs in undertaking this statutory function.

Recommendations

That the Committee:

- 1. Notes the Council's existing Fees Policy for the licensing of mobile homes and caravans.**
- 2. Notes the proposed increase in fees and charges for the licensing activities associated with mobile homes and caravan sites, proposed for implementation from 1 April 2024.**

Decision Information	
Is this a Key Decision?	No
Does the report contain any exempt or confidential information not for publication?	No
What are the relevant corporate priorities?	High Performing Council
Which wards are impacted?	All

1. Implications

Taking into consideration implications relating to finance and procurement, legal and governance, risk and mitigation, health and safety, diversity and inclusion, safeguarding, staffing, community safety, mental health and wellbeing and the impact on the Council's declaration of a climate change emergency, the following implications have been identified:

Finance and Procurement

- 1.1 The amendments to the fees and charges detailed in paragraph 2.3 of this report will be presented to Council for approval as part of the 2024/25 budget setting process.

Completed by Alison Hall-Wright, Assistant Director of Finance and Deputy S151 Officer

Legal and Governance

- 1.2 The Caravan Sites and Control of Development Act 1960 Section 10A allows the Authority to charge a fee for certain activities related to the statutory functions associated with the licensing of sites under the Caravan Sites and Control of Development Act 1960. For a fee to be charged a policy is required to be published stating the fees that are applicable.
- 1.3 An equality impact assessment is not required as it does not adversely affect any protected characteristics.
- 1.4 The decision associated with the fees and charges associated with mobile homes and caravan sites will be included as part of the Council's annual budget setting process.

Completed by: Graham Watts, Assistant Director of Governance and Monitoring Officer

2. Background to the Report

2.1 The Caravan Sites and Control of Development Act 1960 requires “relevant protected sites” to be licensed by the Council. This is to ensure standards on such sites are maintained and to ensure more effective enforcement when site licence holders fail to comply with their licence obligations. In this context a relevant protected site to which the legislation applies are typically known as residential parks, mobile home parks or park homes sites.

2.2 As the requirement to process licence applications is a statutory requirement placed upon the Council the Caravan Sites and Control of Development Act 1960 allows for a fee to be charged to cover the costs associated with the activities surrounding this. Prior to a fee being charged a policy detailing the fees applicable is required to be published. The Council has an existing policy and a methodology established for the calculation of such fees. The fee is reviewed on an annual basis using the existing methodology and represents the cost to the Council in carrying out the function.

2.3 The only alteration to the existing policy is the increase of fees, the table below sets out the existing fees and the proposed fees:

Chargeable activity	Existing fees	Proposed fees
Application for a new site licence comprising of; Part A Part B	£543.00 £502.00 £41.00	£590.00 £545.00 £44.00
Transfer/amendment of up to 2 licence conditions	£203.00	£219.00
Significant amendments involving a site visit	£329.00	£355.00
Annual Fee	£81.00	£88.00
Additional Annual Fee per Plot	£5.50	£6.00
Enforcement	Based on an hourly rate	Based on an hourly rate
Deposit of site rules	£87.50	£95.00
Replacement licence certificate	£30.00	£33.00
Residential Site Fit and Proper person test	£277.00	£299.00

2.4 There are currently 51 licenced sites within the boundaries of South Kesteven and most fees do not have an impact upon these sites as some are exempt from certain charges. The exemptions are listed within Appendix 2 of the Policy (see Appendix A to this report). The regular fee that will have an impact on existing licenced sites are those to which the annual fee is applied and there are only currently 4 sites that this is relevant to. The fee increase is a small amount and it is anticipated that this will not have an adverse effect upon those site licence holders.

3. Key Considerations

- 3.1 As the licensing of relevant protected sites under the Caravan Sites and Control of Development Act 1960 is a statutory function, therefore a requirement that the activity be undertaken. As the legislation allows for the costs associated with these activities to be charged to licence holders and applicants it is appropriate to do so.
- 3.2 Charging for the activity is aimed at cost recovery.

4. Other Options Considered

- 4.1 To not increase the fees to represent the costs incurred and to continue with the existing fee structure.
- 4.2 To no longer charge for the activities and revoke the Fees Policy for Licensing of Mobile sites. This would result in the Council incurring the full costs without recovering any fees.

5. Reasons for the Recommendations

- 5.1 The fees currently charged for licence related activities under the Caravan Sites and Control of Development Act 1960 are no longer the accurate as the costs that will be incurred by the Council in the next financial year for this activity has increased.
- 5.2 Therefore it is recommended that the amended fees be approved, and the policy published to allow the Council to cover the associated costs relevant to the statutory function.

6. Consultation

- 6.1 There is no statutory requirements for a consultation on the proposed fee increase. As the fee calculation methodology has not changed and the fees are related to the carrying out of a statutory function it is proposed that no consultation is undertaken.

7. Background Papers

- 7.1 [Mobile Homes Act 2013: a guide for local authorities on setting licence fees - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/mobile-homes-act-2013-a-guide-for-local-authorities-on-setting-licence-fees)

8. Appendices

- 8.1 Appendix A: Draft Amended policy – Fees Policy for Licensing of Mobile Homes



SOUTH
KESTEVEN
DISTRICT
COUNCIL

Fees Policy for Licensing of Mobile Homes

Approved February 2015 updated April 2024

Contents

- 1.0 INTRODUCTION**
- 2.0 EXCLUSIONS**
- 3.0 LICENSING FEES**
- 4.0 OTHER CHARGES**
- 5.0 SUMMARY OF FEES**
- 6.0 REVISING AND PUBLISHING THE POLICY**

1.0 INTRODUCTION

1.1 Under the Caravan Sites and Control of Development Act 1960 South Kesteven District Council (SKDC) issues site licences for sites that have relevant planning permission. This legislation has been amended by the Mobile Homes Act 2013 (MHA) which aims to raise standards in the industry and provide for more effective enforcement when site licence holders fail to comply with their licence obligations. The MHA also introduces some important changes to the buying, selling or gifting of a park home and the pitch fee review process.

The changes relating to site licensing came into force on 1 April 2014. Licences issued under the Caravan Sites and Control of Development Act 1960 still remain in force, but the new enforcement powers will apply and local authorities will be able to charge fees for functions relating to “relevant protected sites”.

1.2 A relevant protected site is defined in the Act as any land to be used as a caravan site other than one where the application for a licence is:

- For holiday use only, or
- Subject to restrictions or conditions which limit the times of the year when the site may be used for stationing caravans for human habitation (e.g. planning conditions)

1.3 Relevant protected sites to which the legislation applies are typically known as residential parks, mobile home parks or park homes sites. Other sites which are not relevant protected sites are still subject to licensing under the Caravan Sites and Control of Development Act 1960 but no fee is required to be paid.

2.0 EXCLUSIONS

2.1 For clarity, this policy will not apply to the following types of site:

- A site which has consent for holiday use only – whether or not there are restrictions relating to occupation of caravans on the site.
- A site which has consent for holiday use and ancillary residential use by the owner and/or his employees only.
- A site on which caravans are not permitted to be stationed permanently by virtue of planning permission.
- A site where the planning permission requires caravans or pitches to be vacated at certain times of the year and/or prevents them being slept in during certain times.
- A site where the consent requires the site to close at certain times of the year.

- A site with planning permission as a caravan site but the consent is silent on type of use, but its actual use is as a holiday site (and not for any residential purpose).
- Land on which a caravan is stationed which is attached and belongs to a dwelling (e.g. a parking space or front or back garden)
- Sites occupied by exempted organizations
- Sites on agricultural or forestry land used by seasonal workers
- Local Authority or County Council owned sites
- Sites used by travelling showmen who are members of a relevant organization.

2.2 In addition, SKDC consider it appropriate to exempt the following sites from annual licensing (but not other fees):

- Single unit sites and Gypsy Roma and Traveller sites. These are not run as a business and the cost of annual licensing is outweighed by the cost of administering and recovering any charges.

Any complaints in relation to these sites will be dealt with as appropriate.

3.0 LICENSING FEES

3.1 Before a local authority can charge a fee, it must prepare and publish a fees policy. When fixing a fee the local authority:

- Must act in accordance with its fees policy
- May fix different fees in different cases
- May determine that no fee is required in some cases

3.2 In setting the policy and the fees to be charged SKDC has had regard to the Guide for Local Authorities on Setting Site Licensing Fees issued by the Department for Communities and Local Government.

3.3 Under the new Act, a fee can be charged for:

- applications to grant a new licence
- applications to transfer or amend an existing licence
- annual licence fees for administering and monitoring existing sites.
- depositing of site rules
- taking enforcement action (charged separately from licence fees)

3.4 The fees have been calculated based on the estimated average time and costs involved in undertaking the following activities; all administrative costs incurred in the licensing process, officer visits to sites, travel costs, consultations, meetings, monitoring of sites/investigation of complaints and the giving of informal advice.

3.5 Application for a new site licence

A site licence can only be issued for a site which has valid planning permission for the use.

The fee for a new site licence is **£590.00**. Comprising of **Part A £545.00** and **Part B £44.00**

3.6 Transfer/amendment of existing site licence

A licence holder may apply to transfer a site licence or to vary or cancel an existing site licence condition.

If SKDC deem it necessary to vary or cancel an existing licence condition no fee will be payable.

The fee to transfer or amend up to 2 licence conditions is currently **£219.00**.

Where there are significant changes this is likely to involve a site visit. Where a site visit is also required the fee is currently **£355.00**.

3.7 Annual fees for existing licences

The annual fee is currently **£88.00**. Additional annual fee **per plot £6.00**. This is calculated on the price per unit based on the total estimated cost to SKDC in carrying out its annual licensing function. The cost per pitch is multiplied by the number of units permitted on the site license to provide the annual fee payable.

3.8 Charging arrangements and payments of fees

The annual fee is due on 1st April each year. In 2014 only, the annual fee will be calculated on a pro-rata basis for the remainder of the year from the date of approval of the policy. (Legislation allows the licence holder to pass on the cost of the annual fee for 2014/15 in the pitch fee).

All fees will be charged to the site licence holder and all invoices will be payable within 14 days.

Where a new site licence is issued part way through a year, the annual fee will be due the following April.

The council requires application fees for a new site licence, for amending a site licence or for transferring a site licence to accompany the application. The council will not commence the application process until such time as the fee is received.

Application fees are not refundable if the application is not approved.

Where a fee becomes overdue for payment, the council may apply to a First Tier Tribunal (Property Chamber) for an order requiring the licence holder to pay the amount due by the date specified in the order. If the licence holder has still not paid the fee within three months from the date specified in the order, SKDC may apply to the tribunal for an order revoking the site licence.

A review of the fee structure will be carried out annually and it will be revised if necessary. Any adjustments will take into account variations in officer and administration time to those used in calculating the fees set out in this policy document, along with any changes to other costs incurred in providing the licensing function.

4.0 OTHER CHARGES

4.1 Enforcement Expenses

The council is entitled, and will seek, to recover expenses incurred in carrying out enforcement action involved in the service of a compliance notice. These expenses include costs incurred in deciding whether to serve a notice, site inspections, preparing the notice and obtaining expert advice.

Where appropriate, the council will also seek to recover expenses incurred:

- In taking action following conviction of the site owner for failure to carry out actions required by a compliance notice; or
- In taking emergency action where there is an imminent risk of serious harm to any person on the site as a result of the site owner's failure to comply with licence conditions

Interest may be charged on any sums to be recovered as a result of enforcement action.

Any of the debts to be recovered for enforcement actions will be registered as a local land charge against the site.

Charges for enforcement cannot be passed onto the residents pitch fee.

Charges for enforcement will be based on an hourly rate.

4.2 Deposit of Site Rules

Site rules are made by the site owner to ensure acceptable standards are maintained on the site for the benefit of all of the occupiers. The Mobile Homes (Site Rules) (England) Regulations 2014 changes the way site rules are agreed between site owners and residents. There is no requirement for site rules to be in place, but where they are site owners are required to use the procedure set out in the Regulations. If park owners fail to follow these

Regulations within the time frame park owners will not be able to rely on existing park rules. The cut off point for complying with the new process will be 3 February 2015.

Site rules for protected sites must be deposited with SKDC and the register published online. Before publishing the site rules SKDC will ensure that the rules have been made in accordance with the statutory procedure.

5.0 SUMMARY OF FEES

5.1 The applicable fees will be reviewed annually and published on the Council's website. The current fees from 1 April 2023 are as follows:

Application for a new site licence comprising of;	£590.00
Part A	£545.00
Part B	£44.00
Transfer/amendment of up to 2 licence conditions	£219.00
Significant amendments involving a site visit	£355.00
Annual Fee	£88.00
Additional Annual Fee per Plot	£6.00
Enforcement	Based on an hourly rate
Deposit of site rules	£95.00
Replacement licence certificate	£33.00
Residential Site Fit and Proper person test	£299.00

6.0 REVISING AND PUBLISHING THE FEE POLICY

6.1 The fees policy for licensing of residential park home sites will be published on the council's website

6.2 If the council revises its fees policy, it will replace the published policy with the revised policy. The policy will also be available to view during normal office hours at: South Kesteven District Council, Council Offices, The Picture House, St Catherine's Road, Grantham, NG31 6TT



SOUTH
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DISTRICT
COUNCIL



Housing Overview and Scrutiny Committee

21 September 2023

Report of: Councillor Phil Dilks
Cabinet Member for Housing and
Planning

HRA Acquisition and Disposal Policy

Report Author

Craig Spence, Acting Director of Housing

craig.spence@southkesteven.gov.uk

Purpose of Report

To inform the Committee of the new HRA Acquisition and Disposal Policy which sets the framework for the way in which we acquire and dispose of land or assets to and from the Housing Revenue Account.

Recommendations

That the Committee:

1. The Committee notes the HRA Acquisition and Disposal Policy is in line with best practice and will provide clear operational guidance.
2. The Committee recommends that the Acting Director of Housing make alterations and amendments to the Policy to incorporate comments arising from committee discussion, for submission and adoption at Cabinet.

Decision Information

Does the report contain any exempt or confidential information not for publication?	No
What are the relevant corporate priorities?	Housing that meets the needs of all residents
Which wards are impacted?	All

1. Implications

Taking into consideration implications relating to finance and procurement, legal and governance, risk and mitigation, health and safety, diversity and inclusion, safeguarding, staffing, community safety, mental health and wellbeing and the impact on the Council's declaration of a climate change emergency, the following implications have been identified:

Finance and Procurement

- 1.1 There is a proposal being presented to Council on 28 September to allocate funding of £1m which if approved will be utilised to acquire assets which meet the criteria set out in this policy.

Completed by: Alison Hall-Wright, Assistant Director of Finance and Deputy S151 Officer

Legal and Governance

- 1.2 Adoption of a new Acquisition and Disposal Policy for the Housing Revenue Account will provide a clear framework and procedure to follow when undertaking such transactions, ensuring robust governance.

Completed by: Graham Watts, Assistant Director of Governance and Monitoring Officer

Human Resources

- 1.2 The Council needs to ensure that adequate resources and its staffing levels are sufficient to implement the Council's policy effectively.

Completed by: Fran Beckitt (Interim Head of HR)

2. Background to the Report

- 2.1 The Council has a clear commitment in its Corporate Plan 2020-2023 to provide "*Housing that meets the needs of all residents*". As a stock-retained local authority, the Council has around 5,900 properties.

2.2 The HRA Acquisition and Disposal Policy (Appendix 1) aims to identify a process and define the procedure to be followed to underpin how the Council acquires and disposes of properties in relation to the Housing Revenue Account.

3. Key Considerations

3.1 The HRA Acquisition and Disposal Policy is a critical working document which enables the Council to responsively acquire and dispose of properties following completion of the appropriate pro-forma contained within the policy.

3.2 The Council recognises that there may be opportunities to acquire and dispose of properties to enable the housing service to operate more efficiently and effectively as an essential part of a much wider asset management function.

4. Other Options Considered

4.1 Continue without an adequate policy or procedure.

5. Reasons for the Recommendations

5.1 The clarity provided by the HRA Acquisition and Disposal Policy, enables staff working in the service to make operational decisions efficiently and consistently. This in turn provides greater transparency and understanding for the reasoning and decision making process in relation to property acquisitions and disposals within the Housing Revenue Account.

6. Consultation

6.1 Consultation has been undertaken within the wider teams in the Housing Directorate. The presentation of this Policy for Scrutiny is a key consultation step.

7. Appendices

7.1 Appendix 1 – HRA Acquisition and Disposal Policy
Appendix 2 – HRA Acquisition and Disposal Policy Equality Impact Assessment

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**SOUTH
KESTEVEN
DISTRICT
COUNCIL**

**South Kesteven District Council
Housing Revenue Account
Asset Acquisition and Disposal Policy
2023**

Service Area	Housing		
Policy Owner	Director of Housing		
Introduced	2023	Last Reviewed	n/a
Version	One	Review Date	2026

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1. Introduction

The Councils, Housing Revenue Account Acquisition and Disposal Policy applies to the council's acquisition and disposal of land, development sites, residential properties, former council properties, current housing stock and empty homes acquired using Right to Buy receipts, Sec 106 affordable homes funding or HRA reserves to increase the supply of affordable homes and to bring more empty homes back into use.

2. Use of capital receipts acquired through Right to Buy

Under the latest Right to Buy (RTB) regulations owners of former council homes purchased under RTB regulations must, if they wish to re-sell their property within ten years of their initial purchase, offer it to their former landlord (the council), or another social landlord.

Should the sale take place within the first 5 years of their ownership they must also repay a percentage of the RTB discount they have received on the purchase of the property.

Local Authorities have the ability to reinvest RTB receipts within Retention Agreements (so-called 1-4-1 capital receipt agreements) for a period of 5 years. RTB receipts can be used for 30% of the capital costs of purchase and repair of a property or new build on the basis that they provide a one for one replacement for affordable housing (as defined by section 68 (1)(a) of the Housing and Regeneration Act 2008.)

The number of RTB sales over the past five years are shown in the table below.

Year	Number of RTB sales	Receipts £
2022/23	40	3,448,960
2021/22	21	1,645,785
2020/21	28	1,909,290
2019/20	56	3,794,320
2018/19	64	3,649,420

As a result of these sales there is a pressure on the council to spend RTB retained capital receipts for the purposes of replacing social housing. Any underspend of retained capital receipts will have to be returned to the Secretary of State with interest of 4% above the base rate on a day-to-day basis compounded with three monthly rests.

3. Criteria for Acquisition of former council homes

It is proposed that former council properties that are offered back to the council for purchase or are for sale on the open market will be assessed and a business case prepared with a recommendation to either purchase or reject the property. We will aim to purchase as many properties as is required to negate the requirement of returning

any RTB receipts. Properties can be purchased through the Right of Return process or through proactive engagement with local estate agents to identify available properties.

The decision to purchase properties will be dependent on a business case and considered on a property-by-property basis which would be determined by the following factors:

- There is a specific housing need for the type, size and location of the property that is being offered, in accordance with the council's housing register.
- A property is considered of strategic importance, for example individual units within a council owned block or located within the council's defined regeneration area.
- The decision to purchase individual properties funded by retained capital receipts will be considered alongside any planned or potential purchase of larger sites/properties.
- Larger sites/properties will be prioritised over individual properties if at any time there is a limit on the availability of the council's retained capital receipts.
- The purchase price and refurbishment costs will be met through RTB receipts and prudential borrowing or resources within the Housing Revenue Account, whichever is determined most financially prudent at the time of purchase.
- The non-availability of any RTB receipts will, however, not restrict the purchase of individual properties if there is still a business case to support the acquisition.
- The viability of the purchase, refurbishment and borrowing costs will be assessed against rent levels as set out in the council's rent policy to ensure that all purchased properties are self-funded and do not exceed the ceiling price. The property is purchased with vacant possession.
- Each party will bear the costs of their own legal and valuation fees.
- Each decision will be made bearing in mind the protected characteristics of the Equality Act.

The following process for the acquisition of former council homes will be adopted:

- Once a property has been identified a HRA Asset Acquisition pro-forma (Appendix A) shall be completed by a Housing Head of Service with sign off from the Director of Housing.
- The pro-forma shall be passed to the Chief Finance Officer or Assistant Director of Finance for authorisation.
- Once authorised the instruction sheet shall be passed to the relevant team/officer or external company for execution.

4. Criteria for Acquisition of strategic land sites and private housing.

The council are on occasions approached directly by landowners/property owners offering to sell vacant, recently developed housing sites or individual private properties. It is proposed that residential sites offered to the council for sale directly or that become available on the open market are assessed to determine if they meet the council's strategic priorities and a defined local housing need.

The decision to purchase sites will be dependent on a business case informed by the completion of a HRA Asset Acquisition pro-forma (Appendix A) and considered on a site-by-site basis which would be determined by the following factors:

- Due to the financial costs and resources required by the council to purchase

land/properties, larger sites will be prioritised over individual properties if resources are limited at any time.

- The viability of the purchase, new build/refurbishment and borrowing costs will be assessed against rent levels as set out in the council's rent policy to ensure that all development/developed sites/private properties are self-funded.
- The council will undertake land valuations (to be appointed internally or externally depending on the expertise/capacity available at the time) and ground surveys where necessary when considering any purchase of land sites.
- The purchase price and refurbishment costs will, in the first instance, be met by RTB receipts with the balance of financed through prudential borrowing or resources within the Housing Capital Programme. The non-availability of any RTB receipts will, however, not restrict the purchase of individual properties if there is still a business case to support the purchase.
- Where RTB receipts are used to purchase sites there is a specific housing need in location that is being offered, in accordance with the council's housing register. Where a site is purchased with existing housing the properties are sold with vacant possession.
- Each party will bear the costs of their own legal and valuation fees.
- Each decision will be made bearing in mind the protected characteristics of the Equality Act.

5. Criteria for Disposal of HRA assets.

The council are on occasions required to consider the disposal of HRA assets, whether that be parcels of land or properties. There can be numerous reasons for disposal of assets, to include, cost prohibitive building types reducing the ability to achieve lettable standards, listed buildings that require extensive and expensive alterations or repairs and small parcels of land that are maintained by the Council that have little value.

The decision to dispose of HRA assets will be considered following the completion of a HRA Asset Disposal pro-forma (Appendix B).

The following process for the disposal of HRA assets will be adopted:

- Once an asset has been identified a HRA Asset Disposal pro-forma (Appendix B) shall be completed by a Housing Head of Service with sign off from the Director of Housing.
- The pro-forma shall be passed to the Chief Finance Officer or Assistant Director of Finance for authorisation.
- Once authorised the instruction sheet shall be passed to the relevant team/officer or external company for execution.
- Each decision will be made bearing in mind the protected characteristics of the Equality Act.

In relation to the disposal of council homes following approval of the proposal the council are required to seek authorisation to dispose from the Secretary of State.

6. Appendix A

HRA Asset Acquisition pro-forma

To be completed in accordance with the SKDC HRA Asset Disposal and Acquisition Policy

Date, Monday, 11 September 2023

Prepared by,

Property address,

Site plan,

Valuation (include refurbishment costs)

Rental value per week (48 chargeable weeks per annum), £

Payback period in years =

Housing need to address (Housing, Supply, Homelessness, Development Opportunity),

Condition,

EPC,

Bedrooms,

Storeys,

Adaptable,

Parking,

Reason for acquisition,

Funding split, (HRA Capital, 1 for 1, sec 106)

Decision taken by,

Finance comments and sign off,

Authorised by,

7. Appendix B

HRA Asset Disposal pro-forma

To be completed in accordance with the SKDC HRA Asset Disposal and Acquisition Policy

Date, Monday, 11 September 2023

Prepared by,

Property address,

Site plan,

Valuation,

Void cost if applicable, £

Rental value per week (48 chargeable weeks per annum), £

Payback period in weeks = Void cost divided by rental income,

Reason for disposal,

Decision taken by,

Finance comments and sign off,

Authorised to apply to Secretary of State by,

Authorisation date,

Secretary of State approval, Yes/No

Secretary of State approval date,

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Equality Impact Assessment

Question	Response
1. Name of policy/funding activity/event being assessed	Housing Revenue Account Asset Acquisition and Disposal Policy
2. Summary of aims and objectives of the policy/funding activity/event	The purpose of the policy is to set out the circumstances in which the Council will acquire and dispose of land, development sites, residential properties, former council properties, current housing stock and empty homes.
3. Who is affected by the policy/funding activity/event?	Residents of South Kesteven district in need of council housing.
4. Has there been any consultation with, or input from, customers/service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please complete the consultation table below.	Consultation not required to be undertaken.
5. What are the arrangements for monitoring and reviewing the actual impact of the policy/funding activity/event?	To be completed.

Protected Characteristic	Is there a potential for positive or negative impact?	Please explain and give examples of any evidence/data used	Action to address negative impact e.g. adjustment to the policy <small>(The Action Log below should be completed to provide further detail)</small>
Age	Positive	The policy will allow the acquisition of properties and land to provide affordable housing which will positively affect both young people and older people, who particularly tend to need affordable housing both in our towns and in the rural areas of the district.	
Disability	Positive	As above, the policy will allow the acquisition of properties and land to provide affordable housing which will positively affect people with disabilities, who particularly tend to need affordable housing both in our towns and in the rural areas of the district.	
Gender Reassignment	N/A	This protected characteristic is not affected by this policy and the implementation of it.	



Marriage and Civil Partnership	N/A	This relates to employment legislation only and therefore is not relevant.	
Pregnancy and Maternity	Positive	As with age and disability, the policy will allow the acquisition of properties and land to provide affordable housing which will positively affect people who are on maternity leave and on a lower income as they particularly tend to need affordable housing both in our towns and in the rural areas of the district.	
Race	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Religion or Belief	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Sex	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Sexual Orientation	N/A	This protected characteristic is not affected by this policy and the implementation of it.	
Other Factors requiring consideration			
Socio-Economic Impacts	Positive	The policy will allow the acquisition of properties and land, which will positively affect people who need affordable housing.	
Carers (those who provide unpaid care to a family member, friend or partner)	Positive	The policy will allow the acquisition of properties and land, which will positively affect people who need affordable housing. In particular this includes carers who need to live in the same village as the person they are caring for and there is no, or limited, public transport.	



Consultation

Negative impacts identified will require the responsible officer to consult with the affected group/s to determine all practicable and proportionate mitigations. Add more rows as required.

Group/Organisation	Date	Response

Proposed Mitigation: Action Log

To be completed when barriers, negative impact or discrimination are found as part of this process – to show actions taken to remove or mitigate. Any mitigations identified throughout the EIA process should be meaningful and timely. Add more rows as required.

Negative Impact	Action	Timeline	Outcome	Status

Evaluation Decision

Once consultation and practicable and proportionate mitigation has been put in place, the responsible officer should evaluate whether any negative impact remains and, if so, provide justification for any decision to proceed.

Question	Explanation / justification	
Is it possible the proposed policy or activity or change in policy or activity could discriminate or unfairly disadvantage people?		
Final Decision	Tick	Include any explanation/justification required
1. No barriers identified, therefore activity will proceed		
2. Stop the policy or practice because the data shows bias towards one or more groups		
3. Adapt or change the policy in a way that will eliminate the bias		
4. Barriers and impact identified , however having considered all available options carefully, there appear to be no other proportionate ways to achieve the aim of the policy or practice (e.g. in extreme cases or where positive action is taken). Therefore you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision		



Did you consult with an Equality Ally prior to carrying out this assessment? Yes

Sign off

Name and job title of person completing this EIA	Celia Bown, Senior Housing Policy and Strategy Officer
Officer Responsible for implementing the policy/function etc	Craig Spence, Acting Director of Housing
Date Completed	31 st July 2023
Line Manager	Jodie Archer
Date Agreed (by line manager)	7 th August 2023
Date of Review (if required)	

Completed EIAs should be included as an appendix to the relevant report going to a Cabinet, Committee or Council meeting and a copy sent to equalities@southkesteven.gov.uk.

Completed EIAs will be published along with the relevant report through Modern.Gov before any decision is made and also on the Council's website.

Housing Overview and Scrutiny Committee: Draft Work Programme 2023/24

No	Item	Meeting Date	Lead Officer	Requirements	Notes (including reporting timeframes)
1.	Regulatory Compliance update	21/09/23	Craig Spence		September 2023
2.	HRA Capital Programme – Progress Monitoring	21/09/23	Craig Spence		September 2023
3.	Earlesfield Programme update	21/09/23	Craig Spence		September 2023
4.	Update following Void Workshop (Future workshops)	21/09/23	Craig Spence		September 2023
5.	Fee Policy Licensing of Mobile Homes	21/09/23	Ayeisha Kirkham		September 2023
6.	HRA Disposal & Acquisitions Policy	21/09/23	Craig Spence		September 2023
November 2023					
1.	Regulatory Compliance update	16/11/23	Craig Spence		November 2023
2.	Choice-based lettings	16/11/23	Craig Spence		November 2023
3.	Private Sector Housing Enforcement Policy	16/11/23	Craig Spence		November 2023

Future Items					
	Private Sector Housing Assistance Policy	Meeting date to be confirmed	Craig Spence		TBC
	Housing in Multiple Occupation Policy	Meeting date to be confirmed	Craig Spence		TBC