

Cabinet

Date: **15 May 2025**

Time: **2.00pm**

Venue: **Council Chamber, Hove Town Hall**

Members: **Councillors:** Sankey (Chair), Taylor (Deputy Chair), Allen, Daniel, Miller, Muten, Robins, Rowkins and Williams

Contact: **John Peel**
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Chief Executive
Hove Town Hall
Norton Road
Hove BN3 3BQ

Date of Publication - Wednesday, 7 May 2025

AGENDA

Part One

Page

199 PROCEDURAL BUSINESS

- (a) **Declarations of Interest:** Statements by all Members present of any personal interests in matters on the agenda, outlining the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
- (b) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and online in the Constitution at Part 3E

200 MINUTES

To Follow

To consider the minutes of the meeting held on 24 April 2025

201 CHAIR'S COMMUNICATIONS

202 CALL OVER

203 PUBLIC INVOLVEMENT

To consider the following matters raised by members of the public:

- (a) **Petitions:**
To receive any petitions presented by members of the public.
- (b) **Written Questions:**
To receive any questions submitted by the due date of 12 noon on the 9 May 2025.
- (c) **Deputations:**
To receive any deputations submitted by the due date of 10am on the 2 May 2025.

204 ISSUES RAISED BY MEMBERS

To consider the following matters raised by Members:

- (a) **Written Questions:**
To consider any written questions

205 MATTERS REFERRED TO THE EXECUTIVE

206 REPRESENTATIONS FROM OPPOSITION MEMBERS

207 IMPROVING THE CULTURE OF ENVIRONMENTAL SERVICES 7 - 22

Contact Officer: Rachael Joy
Ward Affected: All Wards

208 FOOD WASTE AND RECYCLING 23 - 34

Contact Officer: Rachael Joy
Ward Affected: All Wards

209 HOUSING SAFETY AND QUALITY COMPLIANCE UPDATE 35 - 68

Contact Officer: Rachel Kelly
Ward Affected: All Wards

PART TWO

210 PART TWO MINUTES OF THE PREVIOUS MEETING To Follow

To consider the Part Two minutes of the meeting held on 24 April 2025.

211 PART TWO PROCEEDINGS

To consider whether the items listed in Part Two of the agenda and decisions thereon should remain exempt from disclosure to the press and public.

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Further information

For further details and general enquiries about this meeting contact John Peel, (01273 291058, email john.peel@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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Brighton & Hove City Council

Cabinet

Agenda Item 207

Subject: Improving the Culture and Service Performance of Environmental Services

Date of meeting: 15 May 2025

Report of: Cabinet Member Net Zero and Environmental Services

Contact Officer: Ali McManamon, Corporate Director City Operations

Tel: 01273 290511

Email: alison.mcmanamon@brighton-hove.gov.uk

Ward(s) affected: All Wards

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 The Council is committed to delivering an inclusive and fair city, one where everyone can thrive and feel included and valued. This includes fighting discrimination, embracing diversity and working to reduce inequality both across the city and within the council as a workplace. As a learning organisation, we are committed to learning from our mistakes and to creating an environment where all staff feel psychologically safe, and where we look after the health and wellbeing of ourselves and each other. This ambition sits alongside our drive to have a city to be proud of, one that is clean and sustainable and where we work together to keep the city clean and effectively manage our waste.
- 1.2 Just after the May 2023 election, the current Administration received a serious whistleblowing complaint about the culture that existed in City Clean (now called Environmental Services), and the hugely negative implications for both staff and residents in terms of the waste collection service provided to the city. The complaint highlighted issues that had existed for many years / decades, and that had not been addressed successfully by previous administrations over the years.
- 1.3 Following receipt of the complaints, and an assessment of their extreme severity, an independent inquiry was launched into behaviours and activity in City Clean. The complaints contained multiple allegations of sexual harassment, discrimination based on disability, bullying and intimidation. Aileen McColgan KC (Kings Counsel) - an eminent Human Rights Lawyer - undertook the investigation.
- 1.4 This report has been prepared to update members on the considerable progress made in implementing the recommendations of the Aileen McColgan report ('the KC report'), to be candid about issues that still need to

be addressed and to explain to residents the next steps the service propose to take to secure a permanent improvement in service performance and customer satisfaction. The report also highlights how the approach taken is embedding our principles of a learning organisation to create a service that will be well connected to our residents, with staff who are confident in carrying out their roles using new technologies and are innovative in their approach to create an excellent service for the city.

2. Recommendations

That Cabinet:

- 2.1 Agrees to note this update report, having indicated its support of the further efforts to ensure lasting changes in the culture of Environmental Services so that residents see visible improvements and benefits.
- 2.2 Approves a Service Recovery Programme investment budget of £0.892m for 2025/26 (£0.532m revenue and £0.360m capital), the funding of which is outlined in the financial implications, enabling the service to continue to drive the change needed.
- 2.3 Notes the investment of £3.875m required in 2025/26 to purchase replacement Environmental Services vehicles including vehicles for food waste collection.

3. Context and background information

- 3.1 The council is determined to deliver a waste collection service that the city can be proud of and is taking actions in all areas of the service to address deep-rooted issues that have existed for many decades. The actions being taken will improve the performance of collections, increase recycling and improve the look and feel of the city. A fundamental and essential part of the change is to transform the culture within the service.
- 3.2 The [outcome of the independent inquiry](#) into the culture of City Clean was received on 13th November 2023 and describes numerous accounts of appalling behaviour faced by staff and managers at City Clean.
- 3.3 Aileen McColgan KC found 'The complaints, which I have concluded were well-founded, contained multiple allegations of sexual harassment, race discrimination, discrimination based on disability, bullying and intimidation. As a result of my investigation I have recommended that the Council consider disciplinary action against a number of named individuals'.
- 3.4 The report goes on to describe the role of some GMB representatives and a small group who were perceived as protected by them. The KC said 'they pressurised crews to refuse to work with staff members who were disliked by the reps / individuals perceived as protected. I also heard accounts of some GMB reps within the Council and / or others described as being particularly protected by them imposing pressure on operatives not to cooperate with

management even if they wished to do so’.

- 3.5 The report goes on to conclude ‘I am satisfied that managers at City Clean and elsewhere in the Council have, until recently, been unable to respond appropriately to such behaviour by reason of the threat of industrial action and a (reasonably) anticipated absence of political support. Behaviour of the sort described above became normalised as behaviour such as that outlined above has been emulated by other personnel within City Clean. One witness told me that ‘Aggression has become culturally engrained’.
- 3.6 The KC report identified that weapons were held at the depot in the office that the GMB branch had exclusive access to. Following a search of that office (observed by GMB representatives) we recovered knives, nunchucks, baseball bats and a samurai sword. Charges were brought against a former BHCC employee. Charges were dropped by the CPS earlier this year – a decision they have now acknowledged was wrong but irreversible because of the statutory time limits to reinstate the charges. The GMB has never explained to us the reason for the presence of weapons in their office.
- 3.7 The culture change work which we have instigated at the depot has significantly improved matters but there have also been subsequent examples of suspected criminal damage and intimidation which we continue to address. We understand that the GMB investigated messages from the GMB Sussex social media account warning of ‘chaos’ last year directly before acts of sabotage took place, but we have never been told of the results of this investigation.
- 3.8 On the 25th January 2024, the Chief Executive reported the outcome of the inquiry to [the Strategy, Finance and City Regeneration Committee](#) and it was agreed that changes would be made to the Council’s employment arrangements in line with the recommendations in the report and a Culture Change Programme was put in place. At that meeting the Chief Executive and the Leader of the Council apologised to staff within the service and to residents in the city for the impact the culture had on the service provided.

Progress of KC Report Recommendations

- 3.9 There were several confidential recommendations, including disciplinary action in relation to the behaviour described in the report. These processes have been managed through the council’s employment procedures, and the outcomes are confidential to those involved. Since the report was published, over 40 staff have left the service, either through disciplinary or capability processes or otherwise choosing to leave.
- 3.10 The [public report](#) contained several clear recommendations, all of which were accepted by the council and have been taken forward. Our principles as a learning organisation have been embedded into all the actions that we have taken, with a commitment to test and learn and review our progress as we go along. The main recommendations in the published report can be summarised as follows:

Removing member appeal panels

- 3.11 The KC report recommended that member appeal panels were removed, and that instead of elected members hearing dismissal appeals, these should be heard by senior officers, consistent with the approach taken in most local authorities.
- 3.12 On 25th January, the then Strategy, Finance and City Regeneration Committee approved a change to the council's employment procedure and the involvement of elected members in dismissal appeal panels and collective dispute hearings ended in August 2024. Dismissal appeals and collective disputes are now heard by senior managers not previously involved in the case. Managers are supported and trained to undertake this role.

A review of alleged agreements that are said to apply in the City Clean service, but which are not written or agreed

- 3.13 The KC report states that 'It seems clear to me that GMB reps within the Council have failed to cooperate in any attempt to achieve clarity as to what agreements exist. When the existence of other agreements is questioned, a number of witnesses told me that the stock response is that 'if you haven't got them that's your problem'. 'One witness told me that when people have persisted, having formed the opinion that there was no agreement, 'all hell breaks loose'.
- 3.14 One such report dated the 17th October 2021 effectively prevented managers from performance managing staff, changing rounds without consultation and prevented missed collections being reallocated to other crews. As a result of the recommendations of the KC report and following consultation with staff, this agreement was terminated in April 2024 enabling managers to begin to engage with its own workforce on modernising working practises to the benefit of residents.
- 3.15 Following the report, it has now been clearly communicated that no agreements exist outside of the council's terms and conditions package and operating procedures for the service. This has provided clarity for both managers and staff and ensured that decisions made on working arrangements are focused on the provision of a great service to residents, and a healthy but highly productive working environment.

A review of all consultation arrangements, and the conduct of industrial relations, including a review of previous agreements which are deemed to be unworkable

- 3.16 Prior to the KC report, City Clean Consultation Group (CCG) meetings were held for 3 hours every 6 weeks, and these meetings were attended by GMB but not UNISON, the other recognised Trade Union at the Council. There was a culture of normal management decisions being taken to the CCG meetings, and managers feeling they were 'hailed over the coals' at the meetings.
- 3.17 In line with the recommendations of the report, consultation arrangements for City Clean have been brought in line with arrangements across the

council. Where there are major changes proposed, then meetings with relevant Trade Union representatives are held. The ambition is to ensure that industrial relations are positive and constructive and are supported by our joint endeavours to provide a great service to residents.

A review of disciplinary and grievance procedures to ensure that timescales are adhered to

- 3.18 The KC report expressed significant concern about disciplinary and grievance processes. In addition to the involvement of elected members, there was evidence of obstructive conduct in relation to meetings, with participants being repeatedly unavailable, and meetings being cancelled at short notice.
- 3.19 The number of calendar days from opening to closing a case is tracked and whilst complex investigations, sometimes involving the police, take time to investigate, the overall time cases taken to close a case has fallen.

A review of recruitment practices at City Clean

- 3.20 Some witnesses in the KC process raised concerns about unfair processes relating to recruitment and to the deployment of agency staff.
- 3.21 Following concerns raised in the KC report regarding recruitment and deployment processes, a project was initiated to improve diversity and inclusion in Environmental Service's hiring practices. The project aims to review and enhance recruitment processes for permanent and seasonal roles, with recommendations based on recruitment data and the KC report. Initial efforts focused on managers involved in seasonal campaigns, with plans for broader implementation based on data findings and priorities.
- 3.22 This is a central part of our inclusive and diverse pillar (described in para 3.23 below). Key actions included analysing recruitment data, which showed lower application rates from women and BME backgrounds compared to the wider organisation. An Inclusive Recruitment Workshop was conducted, diverse marketing materials were created, and managers are now required to complete e-learning and are encouraged to attend further training sessions. Bespoke support from the council's recruitment team ensures ongoing assistance, fostering inclusivity throughout the recruitment process, and ensuring Environmental Services uses the same best practice approaches as the rest of the council. This aligns strongly to our learning organisation ways of working and ambition to be diverse and inclusive.

Ensuring equal treatment of both the council's recognised trade unions and removal of GMB union office and parking space at Environmental Services

- 3.23 GMB are no longer entitled to a parking space at the Depot or a dedicated office. Both unions are consulted through the Directorate Consultative Group, both unions have access to managers and both unions have been provided with notice boards to keep their members informed. Facilities provided to both GMB and UNISON are in line with arrangements across the council.

A requirement that all staff, including trade union representatives, comply with the Council's behaviour framework

- 3.24 Significant action on culture change has been ongoing, and is outlined in detail below. Unions, whilst remaining passionate about supporting their members, are noticeably more courteous in their direct day to day representation of members than used to be the case. This is much more reflective of our Behavioural Framework and aligned to our learning organisation ways of working ambition to be healthy and psychologically safe.

Environmental Services Culture Change programme

- 3.25 As a learning organisation the Council has established a Way of Working, and a Leadership Framework, based on five 'pillars'. These have been used to guide the design of the culture change programme and to ensure work is aligned to the wider development of culture across the Council. The five pillars to our Way of Working are:



- 3.26 The culture change programme has been ongoing since November 2023 when the KC report was published with the purpose of developing the culture in Environmental Services to become a mainstream part of the Council. The culture change Programme implements the recommendations in the report about the working culture, unacceptable behaviours, and other confidential recommendations in the report.
- 3.27 Culture change is 'done with', not 'done to' our valued staff at Environmental Services. It remains the intention that our staff and unions will have a key role in how Environmental Services becomes simply a nicer, kinder, more respectful and dignified place to work, delivering high quality services to residents.

- 3.28 The culture change programme outlined below embeds the changes already made in the service to implement a zero tolerance of poor behaviour and instigate disciplinary processes to address issues of bullying behaviour. The programme has four phases.

Phase 1: Stabilise:

- Ensure all staff and managers have support and opportunity to be heard.
- Ensure the service feels valued and appreciated - not all 'tarred with the same brush'.
- Ensure access to specialist counselling.
- Apply 'zero tolerance' approach to managing poor behaviour.
- Support and development for frontline managers and supervisors to support effective and consistent behaviour management.

Status: All actioned, and ongoing

Phase 2: Creating conditions for culture change:

- Behaviour expectations reset.
- Council and TU relationship and behaviours reset.
- Mandatory behaviour reset learning and development covering bullying, harassment, equality and discrimination with consequences for failure or refusal to engage.
- Continue to apply 'zero tolerance' – informal and formal procedures.

Status: All actioned, and ongoing

Phase 3: Culture Change

- Co-create future vision for service with staff, manager, TU Colleagues, and other stakeholders across the Council
- Using 'Challenge & Collaboration' events to define the future vision and how the service is going to get there.
- Future focused, reestablishing psychological safety, setting clear vision, 'making it real'.
- Support frontline staff and managers to co-deliver on culture change activities.

Status: Ongoing

Phase 4: Embedding culture change:

- Led by leaders and managers using our Learning Organisation ways of working.
- Mechanisms to support this to be defined.

Status: Ongoing

- 3.29 The programme is ongoing as all culture change initiatives are by their very nature iterative. The time it takes to achieve lasting cultural change can vary widely depending on the context, scale, and approach. Some experts suggest that smaller changes can be noticeable within 6 months, while significant shifts may take 18 months to 2 years. However, embedding change into the core values and practices often requires continuous effort and adaptation. Given the endemic and deeply protracted nature of what has been encountered, embedded change will potentially take between 2-5 years to fully secure.

- 3.30 Measuring the success of the programme is an iterative process. Success will be measured through Employee pulse surveys which tell us about what it is like to work in Environmental Services, improved service performance by reducing missed collections and in resident satisfaction with the service.
- 3.31 A cross-council steering group has been set up to drive culture change, and meets fortnightly to ensure delivery of the programme. Coaching has and continues to be offered to senior leaders within the service. Action Learning Sets have enabled managers to begin to articulate how they can support a changed culture and programmes such as “holding difficult conversations” have been effective in ensuring a focus on performance and business improvement.
- 3.32 The Council takes a Zero Tolerance approach to bullying and harassment and a key focus on the culture change programme addresses this.
- 3.33 The widespread and sustained nature of bullying and harassment had a devastating effect on the workforce. Staff did and some still experience Post Traumatic Stress Disorder. A programme of professional therapeutic support has been provided to those staff.
- 3.34 The behaviour framework has been incorporated into the service and is being used in employee relations case work and performance development discussions and is beginning to be embedded across the service. EDI (Equality, Diversity and inclusion) sessions have been made available to staff with a further tranche scheduled for the autumn as part of a wider programme of ongoing learning.
- 3.35 A further focus has been on Co-Creating a Vision for the Future. A Depot Newsletter is provided to staff each week with regular updates from across the service. A Culture Change Champion staff group has been established to support staff wishing to become ambassadors for the new culture. Plans to establish a management, staff and trade union stakeholder group have not yet been progressed because staff tell us they don’t feel it is psychologically safe to participate because there is not a joint consensus on what happened in the past by all parties. This is explored in the next section of the report.
- 3.36 The culture change work which we have instigated at the depot has significantly improved matters but there have also been subsequent examples of suspected criminal damage and intimidation which we continue to address. We understand that the GMB investigated messages from the GMB Sussex social media account warning of ‘chaos’ last year directly before acts of sabotage took place, but again but we have never been told of the results of this investigation.
- 3.37 Countercultures which challenge dominant organisational values, can create conflict and hinder cohesion. At Environmental Servies a persistent counterculture, reportedly driven by a few individuals, has been described as toxic. Ms McColgan stated she was “satisfied that the working environment at Cityclean can fairly be described as toxic,” and that GMB reps protect

particular union members while displaying “significantly less interest” in others. Despite changes in personnel, the Council continues to address the impact of this counterculture on Environmental Services.

- 3.38 Trade unions are organisations that advocate for employee rights and workplace interests by engaging with employers on matters such as pay, conditions, large-scale redundancies, and disciplinary issues. They play an integral role in fostering productive and fair workplaces, with potential benefits including increased efficiency, profitability, and constructive employee relations. Brighton & Hove City Council recognises the importance of trade unions and has established collective bargaining arrangements with GMB and UNISON. The Council believes that Trade Union recognition provides a good indication of a constructive approach to employee relations. Brighton & Hove City Council is a collective bargaining organisation and recognises GMB and UNISON Trade Unions for this purpose.
- 3.39 The Council remains committed to supporting constructive collective arrangements with recognised trade unions while advocating for a positive and collaborative working environment. Staff have expressed a desire to provide quality services to residents and move past these challenges. The focus is on recovery and fostering a culture that aligns with shared organisational goals.

Environmental Services Culture Change and Service Performance

- 3.40 Following the publication of the independent KC report in November 2023, the City Clean refuse and recycling service improved. Missed kerbside refuse collections reported via the council's website went from 2552 instances in the first two weeks of August 2023, to 205 in the first two weeks of December 2023. A reduction of over 90% in four months. Missed kerbside recycling collections dropped by 68%.
- 3.41 However, since January 2025, a significant setback in performance has occurred and there have been significant issues related to the reliability of the service which is compounded by paper-based systems and ageing fleet and equipment that has caused repeated vehicle defects. The service has also seen significant issues with staffing availability and increase in sickness and difficulties in securing agency staff because of council spending controls. Potentially some of the service issues may stem from intentional counter-cultural behaviours by a very small number of individuals and the service remains very alert to this. This includes sabotage of vehicles.

Average missed collection reports	Rolling 3 months to 16 th Dec 24	Rolling 3 months to 28 th April 25
Full communal bin RECYCLING	4	3
Full communal bin REFUSE	10	9
Missed GARDEN WASTE	63	299
Missed RECYCLING	222	246
Missed REFUSE	273	709
Total	573	1369

- 3.42 Unfortunately, there has continued to be some toxic behaviours impacting the service, including ongoing sabotage of Council vehicles, damage to managers', who are involved in disciplinaries, property including twice slashing tyres, ongoing intimidatory acts both in the workplace and at managers' homes and a death threat was made as recently as January 2025. Recent sabotage has of course been reported to the Police and managed through the council's disciplinary processes, where evidence exists. A team has been mobilised to monitor and document all suspicious activities taking significant time from other important service improvement work.

Performance Improvement programme

- 3.43 Many of the changes described in this section have been made possible by the removal of agreements in the service, that previously prevented performance management, flexible working and reallocation of missed collections, for example Appendix 2 of the 17th October 2021 agreement to end a collective dispute which was in place until 22nd April 2024. Establishing this change, and ensuring staff understand the new way of working has taken time but has been an essential part of making sustainable change for the future. Introducing digital initiatives, such as in-cab technology that allow for the effective management of the service have previously been stalled by historic ways of working and the industrial relations culture. Other changes relate to systemic under-investment in the service, and making the changes needed for long term sustainable improvement.
- 3.44 In recent weeks, to help increase the reliability of the service four additional mechanics have been recruited into our workshop area to ensure a faster turnaround of vehicles needing regular servicing, maintenance or repairs. In addition, three drivers and four loaders joined the service at the beginning April and are now fully operational. It takes four weeks to take drivers through their assessment and training process. At the beginning of May 2026, a further four drivers and four loaders joined the service and at the time of this report were undertaking their training and assessment process. This additional capacity will be deployed to improve the reliability of all our recycling and waste streams across the city.
- 3.45 The service has outdated paper systems which do not interface with multiple stand-alone digital systems. This month a Lead Operations Manager (Data) has been appointed with an immediate task of supporting collection improvement. Additional operations managers will also be appointed to support collection service recovery.
- 3.46 An area of particular concern is vehicle reliability on our communal recycling rounds. Root cause analysis shows that the Council's older communal bin-stock leads to frequent defects. Replacing non-standard community recycling bins which cause repeated vehicle defects to lifting mechanisms will take place over the summer of 2025.

- 3.47 A lack of information about missed collections causes extensive frustration to the relatively small but very significant number of residents who experience it. The service does not seek to minimise the impact this has and has recently provided clarity by asking residents to leave their bins out for 48 hours after collection to enable recovery rounds. Missed bin reallocation takes place constantly across the day and crews must now call in, if they find they have spare capacity. Our missed bin information is often imperfect and changes quickly. We will shortly start to publish the latest information we have on missed collections each day on our website with information about any plans we have to recover the missed collection. This will provide more certainty to residents and save them having to report missed collections we already know about and are taking action to recover.
- 3.48 The Digital Environmental Services (City Clean) programme commenced in 2021 against a timeline that has proved challenging. The purpose of the programme is twofold, to provide a more reliable and efficient service giving us live information on whether crews will complete their rounds. The software will automatically reallocate potentially missed work to other crews. Rounds vary each week due to traffic conditions, the availability of access to properties, the volume and weight residents throw away and the amount of time they need to wait to tip vehicles in the middle of rounds. In-cab technology will support drivers to work to the most efficient route and ensure we keep rounds more evenly balanced across crews. The programme is already deployed and working well in our Trade Waste Service, the plan is to extend this to Garden Waste in June and Refuse and Recycling early in the Summer.
- 3.49 One of the things that frustrates residents and indeed our staff too, is not being able to give accurate information on what happens when a round is delayed. This is because we are often gaining information over our radio systems or waiting for crews to return with round information on paper sheets at the end of the shift. We are working with our customer service team to ensure more accurate information is provided on-line and to callers too. We expect at a later date to be able to provide real time updates by email to customers with a MyAccount. We plan to roll the technology out to our street cleaning teams after we have successfully completed deployment in the waste service.
- 3.50 The programme will be a massive cultural change for our drivers too and we are taking the time to work with them and ensure the new technology is introduced in a way that assists them to do better. Extensive driver and operational manager training and briefing at each phase of the programme is critical to securing the benefits of the investment in the service.
- 3.51 Councils that have already introduced the technology find they have a far more reliable, efficient and resident friendly service and we expect Brighton and Hove residents to be sharing the same benefits soon.
- 3.52 To deliver this Service improvement the following investment is being made through the flexible use of capital receipts to temporarily increase capacity to

sustain the service whilst improvements are made. The commitment investment is as follows:

Table 1 – Investment and funding	Revenue £'000	Capital £'000
Expenditure		
Employee Relations: Employee relations manager for 14 months to drive historic casework forward and reducing sickness absence (includes employee on costs)	70	
Customer Relations and Performance: Additional funding to accelerate the in-cab project	40	
Efficient use of vehicles- standardised vehicle tracking and monitoring software to be fitted to all refuse collection vehicles	147	
Data Analyst Manager: Data Analyst Manager for 14 months to review data from customer, fleet, and HR systems supporting customer and performance improvement. (includes employee on costs)	85	
Additional Operations Managers: An additional two Operations Managers to temporarily increase operational capacity ahead of change programmes reducing current ratio of 1 manager to 37 staff in waste and 1:78 in streets	140	
Driver Development Initiatives: driver development initiatives to improve road safety and reduce vehicle downtime and repair costs.	20	
Training Relief HGV Drivers: Funding is sought to train three relief HGV drivers at a cost of £14.5k12 additional CPC costs to be met by service.	15	
Accountant Support: Funding 50% of an accountant post for 6 months to deliver the budget transformation.	15	
Communal Recycling Bins: Replacing non-standard communal recycling bins which will significantly reduce vehicle defects due to damaged lifting gear		360
Total Expenditure	532	360
Funding		
Mitigation – Revenue funding from Environmental Services improvement budget	250	
One off - service Improvement programme to be funded from capital receipts	282	
PWLB Borrowing (supported by annual revenue costs)		360
Total Funding	532	360

Modernising the fleet

- 3.53 A new Head of Fleet was appointed in January 2025 and immediately reduced the average number of 22 vehicles off road each day to 14. This is still too high. It means more vehicles are carried as spare than need be. Sometimes vehicles critical for a particular waste stream are still not available for protracted periods of time whilst parts are remanufactured and sourced from overseas.
- 3.54 Work has continued at pace to seek to understand and plan to renew the waste fleet. Site constraints at the Hollingdean Depot mean that many vehicles are double shifted and in use 16 hours per day. HGV fleets need regular planned maintenance and servicing every few weeks. The age profile of the fleet has increased, and most of the fleet is well beyond the optimum 7-year replacement cycle. This is partly a lag due to global supply chain issues which developed from Covid and attempts to move to a fleet which met net zero aspirations.



- 3.55 Wider electrical network supply issues beyond the depot mean that the depot is currently operating with the maximum number of electric vehicles that it can manage. Electric vehicles are typically twice the cost of Euro 6 Diesel alternatives. Cost constraints from the cost-of-living crisis impact the Council just as they impact residents creating difficult choices. To bring the age profile of the fleet back on track it will be necessary to purchase Euro 6 diesels this year and next year. This will be reviewed as fleet and market conditions change.
- 3.56 The service is proposing to purchase the following Euro 6 Diesel vehicles using the remainder of the 2024/25 capital allocation of £1.050m together with the 2025/26 capital allocation of £2.5m at a total cost of £3.102m:
- 5 x 26t Refuse Collection Vehicles
 - 2x Luton Vans
 - 4x 12t Diesel Minimatic Refuse Collection Vehicles

- 1x 7.5t Mini Matic Refuse Collection Vehicle
 - 1x Single Cab Caged Vehicle tipper Tail Lift
 - 2x 7.5t Sweeper Vehicles
 - 2 x Single Cab Tail Lift tipper (POPs)
 - 1x Crew Cab Caged Vehicle tipper x 1
 - And in addition the following vehicles are on order at a cost of £458,000 from the Council's 2024/25 capital allocation for replacement vehicles.
 - 2 x Electric Crew Cab Caged Vehicle
 - 1 x Electric Single Cab, Tail Lift, Caged Vehicle
 - Electric Crew Van
 - 5 x Jetwash electric Vans x 2
- 3.57 The current capital programme provides for £2.5m spend per annum to replace vehicles in Environmental Services. As service reliability improves, electrical supply capacity increases and the cost of electric vehicles falls there can be a return to the purchase of electric vehicles.
- 3.58 To provide the food waste service five 16-ton food waste vehicles are also being purchased using a capital grant provided by DEFRA at a cost of £772,500. Lead times for new waste vehicles are typically 8-12 months.
- 3.59 Further significant investment will be required in the coming years to rectify the age profile of the fleet.

Other work being undertaken by the Service

- 3.60 The Hollingdean Depot's operational configuration dates back to the 1880s being the site of the City's "Dust Destructor" and is no longer fit for purpose. The site is not optimised to properly support the fleet operating from it, most staff are working in portacabins which are well beyond their planned lifespan. The site makes meeting health and safety responsibilities more challenging than they need be. Separate programmes are in train to improve security at the depot from internal and external threats, increasing electrical infrastructure and developing a masterplan leading to a phased programme of site and building works designed to make the depot more effective

4. Analysis and consideration of alternative options

- 4.1 A do-nothing option is not possible because bullying and harassment must be investigated, and the recommendations identified in the KCs report must be addressed. Because of the toxic culture at the depot, long standing service development issues have not been prioritised and the stabilisation of the service now means they can be addressed. Not to address them would lead to a service unacceptable to residents.

5. Community engagement and consultation

- 5.1 The Culture change programme will evolve with engagement with staff and will continue with the full involvement of the services culture change champions (see paragraph 3.36 above).

- 5.2 Service improvements will continue to be identified using data collected from customers, and identifying the improvements required to ensure a safe and reliable service to the residents of the city.

6. Financial implications

- 6.1 The report sets out the agreed investment to improve the Culture and Service Performance of Environmental Services. This constitutes short term investment to deliver the performance improvement programme of £0.892m as set out in table 1 of the main report. Of this investment £0.532m is considered to be revenue and £0.360m capital expenditure.
- 6.2 The revenue investment will be funded using existing revenue budget of £0.250m and £0.282m of capital receipts through the councils Transformation Fund. There is a risk that there would not be sufficient capital receipts to be able fund the £0.282m, if this was to materialise then any shortfall in funding would need to be managed within City Operations TBM position for the financial year.
- 6.3 The capital investment of £0.360m to replace communal recycling bins would need to be met from council borrowing, included in the corporate borrowing budgets already is the cost of replacing communal bins capital budgets. Should that specific capital programme underspend in 2025/26 then the revenue costs associated with the new budget will be met from this. However, if that is deemed unavailable other opportunities will need to be explored including the use of reserves (in particular the Waste PFI reserve) or to meet the cost of borrowing from unsupported borrowing within service budgets, as such this would form a pressure in the City Operations budget position for 2026/27, with a potential impact in 2025/26. It is estimated that the annual revenue cost would be £0.081m assuming an interest rate of 4% and a 5-year borrowing term.
- 6.4 The vehicle replacement programme is managed through the council's capital programme, for 2025/26 there is budget available of £3.550m for the replacement of the general fleet and £2.444m available for the food waste programme. The general fleet budget is funded through service borrowing for which there is a growing revenue pressure which is anticipated to be £0.777m in 2026/27 and will need to be addressed through the budget setting process. However, DEFRA have provided funding for the delivery of the food waste programme which will cover the costs in full meaning there is no associated revenue cost with the food waste vehicle investment.
- 6.5 The council's financial management tool, referred to as TBM, will report on the financial impact of this investment on a quarterly basis to Cabinet, any significant variations will be highlighted through that report.
- 6.6 Any borrowing requirement associated with the capital investment will be undertaken in line with the council's Treasury Management Strategy for 2025/26.

Name of finance officer consulted: Craig Garoghan Date: 02/05/2025

7. Legal implications

- 7.1 This report details the strategic response of the Council to the serious issues identified across an area of service delivery of significance to the residents of the city. It outlines in a detailed way the actions taken and still underway, as well as the resources invested in remedying the situation, and is properly a matter for Cabinet.

Name of lawyer consulted: Victoria Simpson Date consulted 30.4.25

8. Equalities implications

- 8.1 The KC investigation, subsequent actions to implement the recommendations and the culture change programme enable the Council to meet its equality duties and responsibilities. The work to improve the culture of Environmental Services is fully aligned to the Council's co-created [Fair and Inclusive Action Plan](#), with actions focused on ensuring our workforce is representative of the city we serve, our workplace is based on a sense of belonging for staff, and the services we provide are accessible and fair for all residents. Improving the service with digital transformation to enable clear and effective information for residents will support this aim.
- 8.2 Improvements that these changes enable in the service will benefit vulnerable residents who we know are adversely affected by an unreliable collection service.

9. Conclusion

- 9.1 Environmental Services has experienced an unprecedented level of bullying and harassment from a group of staff. Their influence has been reduced but it has not gone away. Steps will be taken to continue to eliminate their impact. A culture change programme is supporting the vast majority of hardworking and committed staff and managers who are passionate about delivering good services to residents. The culture change programme has been recognised as being effective by the external LGA peer review. The focus of the programme is about tackling the service improvement that matters to residents, a more reliable service with transparent information about its strengths, successes and weaknesses. Service management remain fully committed to not going back to the chaos and confusion of the past and to embedding our learning organisation ways of working.

Supporting Documentation

1. Appendices

1. None

Brighton & Hove City Council

Cabinet

Agenda Item 208

Subject: Increasing recycling and introduction of food waste collections

Date of meeting: 15 May 2025

Report of: Cabinet member for Net Zero and Environmental Services

Contact Officer: Ali McManamon
Corporate Director, City Operations

Tel: 01273 0511
Email: alison.mcmanamon@brighton-hove.gov.uk

Ward(s) affected: (All Wards);

Key Decision: Yes

Reason Key: Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

For general release

1. Purpose of the report and policy context

- 1.1 The council plan and our drive to deliver a Better Brighton & Hove for All includes a mission to deliver an accessible, clean and sustainable city. This includes managing and minimising our waste and increasing the percentage of waste sent for reuse, recycling and composting.
- 1.2 This report details how we will increase opportunities to recycle through increasing the range of dry recycling materials collected and by introducing a separate weekly food waste collection.

2. Recommendations

- 2.1 Cabinet agrees to note the content of the report and agree the phased implementation of food waste collection , with roll out to be completed by March 2026 as set out a paragraph 3.20 of the report.
- 2.2 Cabinet agrees to collecting additional dry mixed recycling materials.
- 2.3 Cabinet delegates authority to the Corporate Director, City Operations to: -
 - 1) Determine the phasing and implementation of the food waste collection service and additional dry mixed recycling materials collection services across the City in accordance with the above recommendations; and;

- 2) Following consultation with the Director Governance & Law, to enter into all legal arrangements necessary to bring recommendations 2.1 and 2.2 into effect including the variation of the Council's disposal contract with Veolia and East Sussex County Council to allow for the increased Council collection services for the duration of that contract (end date 2033).
- 2.4 Cabinet delegates authority to the Corporate Director, City Operations to procure food waste vehicles and other equipment associated with introducing the new collection services.
- 2.5 Cabinet approves additional revenue budget of £0.678m to the £1.2m already in the service budget. This is to be funded in full from new burdens funding provided by DEFRA for one year only.

Context and background information

- 3.1 Brighton & Hove City Council's approach to improving the environment and broader environmental goals are set out in the Council Plan 2023–2027,¹ the Circular Economy Routemap 2020–2035², and the Carbon Neutral Programme 2030.³ These strategies collectively aim to reduce waste and emissions, promote sustainable resource use, support the shift to a circular economy, and deliver clean, inclusive, and responsive services.
- 3.2 Increasing recycling remains a key priority for the council and work is continuing to expand the range of dry recycling materials and introduce food waste and in compliance with the new legislative requirements of the Environment Act 2021. This report sets out plans to achieve the long-held ambition to see separate food waste collection made available to every household in the city.

Wider Recycling

- 3.3 Plans to introduce the collection of dry mixed recycling materials were announced earlier this year. Plastic bottles, paper, card, tins, cans and aerosol bottles are already currently collected. An expanded range of materials will include food and drinks cartons such as fruit juice and plant-based milks, aluminium foil, foil tray and plastic pots, tubs and trays which includes items like yogurt pots, fruit trays and margarine tubs. The Veolia recovery facility in Hollingdean is being adapted to accept these materials and production line trials are currently taking place to ensure that these new materials can satisfactorily be processed. As soon as the trials show the new materials can successfully be processed through the plant a go live date will be provided. Due to the operational changes needed in the plant, a phased introduction is likely to be needed. It will be necessary for these arrangements to be in place no later than the end of March 2026 in accordance with the requirements of the new legislation. Overall volume will

¹ [Brighton & Hove Council plan 2023-2027](#)

² [Brighton & Hove City Council Circular Economy Routemap 2020-2035](#)

³ [Carbon neutral programme 2030](#)

not increase as items are being moved from the waste stream to the recycling stream.

- 3.4 This report proposes to extend the domestic collections of these materials through to the end of the Council's current joint disposal contract with East Sussex County Council and Veolia, in 2033. It is important to understand that end markets for some of these additional streams are relatively underdeveloped because of the cost of turning these recyclable materials into useable, affordable and marketable products. Therefore, further work will need to be done at a national level between the waste industry, market innovators and government if the full benefits of wider recycling are to be realised. At present, high quality contaminant free materials are more likely to be recycled and the need to ensure this will form part of our marketing campaign.

Food waste

- 3.5 The global UK based charity organisation, Waste and Resources Action Programme estimated that total food waste in the UK amounted to 10.7 million tonnes in 2021, of which 60% comes from households. This is equivalent to around 95 kg per person per year. The food waste also contributes to climate change and environmental degradation, with estimated greenhouse gas emissions of 18 million tonnes of CO₂ equivalent in 2021 and 2022.⁴
- 3.6 In Brighton & Hove, the most recent Waste Composition Analysis (2022) found that 31% of the material in residual bins consisted of food and drink waste. Of this, approximately 75% was classified as avoidable, with 51% of the avoidable food waste found to be still packaged, either partially or fully unopened.⁵ This highlights the scale of food waste still entering the residual stream and the environmental opportunity in diverting it.
- 3.7 We estimate the total amount of food waste generated by households based on residual waste tonnage. In 2022, Brighton and Hove produced 69,787 tonnes of residual waste. Applying the 31% proportion from composition analysis suggests that approximately 21,634 tonnes per year of food waste is currently not being recycled and potentially could be. When divided across the estimated 146,000 households in the city, this equates to around 148.2 kg of food waste per household per year or 2.8kg per week.
- 3.8 However, not all food waste will be captured through the separate collection service. Based on benchmarking with CIPFA Nearest Neighbour local authorities with similar demographics, property types, and collection schemes, the projected annual food waste yield for Brighton & Hove is estimated at **5,057 tonnes, or 0.74 kg per household per week**. This lower figure accounts for real-world variables such as participation rates, capture rate, and the fact that some residents may reduce their food waste once they become more aware of how much they discard. Both figures, one

⁵ M.E.L Waste Insights, Brighton & Hove Residual Waste Compositional Analysis (2022)

based on waste generation and the other on expected capture, help inform planning assumptions and performance targets for the new service.

- 3.9 Currently, any materials not recycled, including food waste, are disposed of by residents in the black bag residual stream which is taken to the Hollingdean Waste Transfer Station (WTS). It is then sent onwards to the Newhaven Energy Recovery Facility generating enough electricity to power 25,000 homes.
- 3.10 Some residents already compost food waste at home for which we do not have any data, and some participate in the community composting scheme run by the Brighton and Hove Food Partnership which recycled 196 tonnes from April 2024 to March 2025.
- 3.11 Brighton & Hove City Council has committed £1.2m revenue funding to introduce a food waste collection service to be delivered directly by the Council. This will enable the service to be introduced this year. Defra are also contributing to the capital cost of purchasing vehicles, caddies and bins as part of the future wider national requirement to collect separate food waste. In addition, Defra are also contributing to the project management and communication costs associated with the launch of the service.
- 3.12 The food waste collection service has required significant detailed planning of new rounds, shift patterns and procurement of the associated specialist equipment that will mean all households in the city, whether living in a kerbside, communal or flats area will be able to recycle their food waste.
- 3.13 All households will receive a year's supply of liners, a 5-litre caddy to place in their kitchen and those living in kerbside areas will additionally receive a 23 litre outdoor caddy. Kerbside collections food waste will be made on a weekly basis with other areas' frequency of food waste collection varying and determined through projected yields from these households. As a minimum all food waste will be collected at least weekly and some communal areas more frequently including daily if needed.
- 3.14 Detailed research has taken place to ensure the caddies are robust, minimise odour and are large enough to cope with the amounts of food waste projected from each household.
- 3.15 Those living in communal areas of the city will be able to dispose of their food waste in a specialist secure communal food waste bin. Please see appendix 1 for more details on the specialist caddies and containers. The communal bins have also been subject to rigorous tests and research prior to selection of the preferred type. They are already in use to collect food waste across the UK. They will be placed alongside the Council's existing sites and any well-founded and meaningful concerns about their placement will be considered on a case-by-case basis after deployment. Food waste is already taken to waste and recycling facilities, from now on they will be collected in separate sealed containers which should reduce issues created by food waste decomposition.

- 3.16 New food waste vehicles are being procured to ensure the waste is collected in accordance with regulations, fitted with jet washing units for cleaning of communal bins and large enough to collect the quantities of food waste generated from households on a weekly basis.
- 3.17 The vehicles are specifically designed for food waste and will be fully sealed to ensure any leachate does not leak out. We have designed collections rounds meaning we will use five 16 tonne vehicles to ensure collections can be made from all households across the city.
- 3.18 Food waste collected through the new service will be managed under the Council's existing joint waste disposal contract with East Sussex County Council and Veolia.
- 3.19 Once collected the food will continue to be taken, as it is currently, to the Hollingdean WTS, tipped into relatively small sized dedicated, sealed food waste containers. Food waste will move out of Hollingdean frequently, which could be two or three container movements per day, meaning the food waste would move off-site quicker than if it were in the black bag stream. As the food waste will now be handled in sealed containers at Hollingdean our assessment is that smell emissions in the local area from food waste will be no worse and possibly better than they are now.
- 3.20 As a result we do not envisage any issues with the food waste continuing to be taken to Hollingdean. Veolia has already implemented a range of odour control measures at the waste transfer station to minimise impacts on local communities and site operations. These include infrastructure upgrades, operational procedures, and staff training. Officers will continue to monitor and engage with Veolia to ensure these measures remain effective and use the learning throughout the implementation period, to improve any processes required accordingly.
- 3.21 Over time, a small increase in vehicle movements required for food waste handling will be offset by fewer vehicle movements required for the black bag stream as the volume of black bag waste will decrease as food waste yields are separated out.
- 3.22 From Hollingdean it will be hauled to an In-Vessel Composting (IVC) facility, in Woodlands, Lewes, the same facility where our garden waste is currently being processed. At the IVC facility, the food waste is biologically processed into compost in a controlled environment. This ensures compliance with hygiene standards and enables the efficient production of compost products.
- 3.23 The service will be introduced in phases across the city, and we are working to tight deadlines with decisions to go live or not with any phase being assessed meticulously throughout. A decision to go live or not will need to meet the set criteria in all phases to ensure introduction is as smooth as possible, with minimal issues. Roll out is anticipated to commence in September 2025 and will need to be completed by March 2026 to comply with the requirements of the Environmental Protection Act 1990 (as amended by the Environment Act 2021). From 1st April 2026 Waste

Collection Authorities will be required to collect all recyclable household waste separately from other household waste, for recycling or composting at least once a week from 1st April 2026.

- 3.24 The implementation is being delivered using the principles of the council as a learning organisation with methods such as agile project management, used to ensure we are iterating improved processes, based on the learning throughout the project.

4. Analysis and consideration of alternative options

- 4.1 An alternative option has been considered to introduce the service across the whole city, on one day rather than phases, however this is too high risk, requiring high levels of staffing resources to successfully roll out at once, phasing in the service gives a longer period to deal with any early delivery issues as they arise in each phase.

5. Community engagement and consultation

- 5.1 A comprehensive communication plan is under development to inform residents about the increased range of dry recycling materials and the new food waste service, including the equipment they will receive, what can and cannot go in food waste bins, how collections work, and the environmental benefits of participating.
- 5.2 Residents will receive an information leaflet prior to the service being implemented, and then a detailed instruction leaflet with their caddy.
- 5.3 A dedicated email will be launched at the time of implementation and the Environmental Services phonenumber will be available for residents to ask questions in relation to the new service.
- 5.4 Communication on food waste will continue during and after the roll out of the service to highlight the importance of continuing to reduce all types of waste and encourage more recycling.
- 5.5 Officers will also be working with the Community Engagement Team to reach communities through existing well-established networks. These include the Trust for Developing Communities, Council Housing Area Panels as well as other local group meetings.
- 5.6 Prior to each phase of the roll-out, engagement and communications will take place in the relevant geographical area and the timeline for this is linked to the phased introduction of the service.
- 5.7 Communication and engagement will take place to ensure that we work together with our valued staff and recognised Trade Unions on this change to the service. This report will be discussed at our Directorate Consultation meeting with the Trade Unions on 5th June, and ongoing engagement will continue to ensure that we are working with staff across the service to make this new service a success.

6. Financial implications

- 6.1 There is a cost of investment associated with the introduction of food waste of £1.878m collection and disposal, which will also result in an on-going running cost.
- 6.2 The 2025/26 budget report agreed by full Council on 22nd February 2025 included recurring revenue pressure funding of £1.2m. In addition to this, DEFRA have committed to providing grant funding for the cost of transition of £0.678m, meaning a total revenue budget for 2025/26 of £1.878m is available to roll the introduction of food waste collection and disposal during 2025/26. The anticipated initial investment includes the hire of vehicles in the short term whilst vehicle acquisitions are completed, crews to man the rounds, cost of distributing the containers, installations costs and project management time. All of this is to be met from within the budget available.
- 6.3 Vehicle acquisitions for the collection of food waste and disposal are to be made through the council's capital investment programme where budget of £2.444m has already been approved, procurement of those vehicles will be carefully managed to ensure that the investment is managed within the budget allocation. Funding for these will be met in full from the DEFRA capital grant already received, therefore there are no financing costs associated with the purchases.
- 6.4 This investment will require on-going revenue investment, which has been represented by the recurring £1.2m revenue pressure approved as part of the 2025/26 budget setting paper. On current estimates there may be a minor pressure arising from those costs which would need to be managed within the service budgets as part of the TBM monitoring process.
- 6.5 Financial monitoring of the investment will be undertaken via the councils TBM reports to Cabinet, which will provide an update if there is a financial issue to address, this is applicable to revenue budget as well as the capital budgets.

Name of finance officer consulted: Craig Garoghan Date: 07/05/2025

7. Legal implications

- 7.1 Section 45 of the Environmental Protection Act 1990 places a duty upon a Waste Collection Authority to arrange for the collection of household waste in its area. Section 45A of the Environmental Protection Act 1990 (as amended by Section 57 of the Environment Act 2021) requires, with effect from 1 April 2026, all recyclable household waste to be collected separately from other household waste, for recycling or composting at least once a week.
- 7.2 The Waste (England and Wales) Regulations 2011 places a duty on Waste Disposal Authorities to ensure that waste which is collected separately is not later mixed with other material with different properties.

- 7.3 The recommendations in this report are in keeping with the above duties and powers.
- 7.4 In exercising the delegated authority to vary the Veolia disposal contract (such variations being necessary as a consequence of the changes to the Council collection services) it will be necessary to comply with the requirements of the relevant procurement legislation.

Name of lawyer consulted: Siobhan Fry Date consulted: 2/05/2025

8. Equalities implications

- 8.1 An Equality Impact Assessment (EIA) for the introduction of food waste collections is currently underway and has identified a number of initial impacts across protected and disadvantaged groups. While the service is being introduced in line with statutory requirements, the Council recognises its responsibility to ensure that implementation is inclusive and accessible for all residents. The EIA will continue to be developed in consultation with the Equality, Diversity, and Inclusion (EDI) team and will be finalised ahead of full rollout.

Initial findings highlight that:

- Older people and disabled residents may experience physical barriers in using the new containers or presenting them for collection. The Council will offer Assistive Collections (Acs) to residents who need them and will ensure this service is promoted effectively.
- Residents with visual impairments, those using mobility aids or pushchairs may face difficulties with food caddies placed on pavements. Collection crews will be briefed, and operational design will consider safe placement of containers after the collection.
- Pregnant residents and carers of young children may encounter similar access and mobility concerns; inclusive service design and communication will aim to mitigate these.
- Residents from migrant or non-English-speaking backgrounds may require translated information or culturally sensitive engagement. Communications will include accessible formats and be available in multiple languages to ensure clarity on how to use the service.
- Low-income households may perceive cost barriers in purchasing compostable liners (although liners are not required). Messaging will clarify that liners are optional, and the use of paper or newspaper is permitted.
- Broader implications for intersectional and minoritised groups, such as those facing digital exclusion, insecure housing, or socio-economic disadvantage, are being considered. The Council will review ongoing feedback and complaints data to identify any further adjustments needed.

- 8.2 The EIA process will continue to inform service development, and any disproportionate impacts will be mitigated through operational measures, inclusive communications, and targeted support.

9. Sustainability implications

- 9.1 The sustainability implications of recycling dry mixed materials and food waste are well documented and contained within the body of this report.

Other Implications

10. Procurement implications

- 10.1 Vehicle acquisitions are to be made through the council's capital investment programme where a budget of £2.444m has already been approved.
- 10.2 The preferred route to market is to engage a procurement service called The Procurement partnership Limited Home - The Procurement Partnership (TPPL).. TPPL use the NEPO framework Fleet | NEPO which offers value for money and access to a nationally-available solution that provides all UK public bodies with a compliant route to market for the acquisition of heavy goods vehicles (HGV) and specialist vehicles. This nationally recognised compliant framework which was let under public contract regulations 2015 (PCR 2015), it is one of the leading compliant frameworks which allow for the direct award and mini competition under the fleet category. Enabling a complaint access to the fleet market accessing specialty Waste collection trucks.
- 10.3 The Procurement partnership limited (TPPL) will share the documents via the Delta e-sourcing portal, with the North Eastern Purchasing Organisation (NEPO) framework supplier cohort in a closed mini-competition, the tenderer submissions will be evaluated to determine the most economically advantageous tender(s) (MEAT) on the basis of the award criteria set out in the mini competition documents and a contract for the food waste vehicles will be awarded to the preferred winning bidder. Because this competition will be conducted under an existing NEPO framework the procurement is subject to Public Contract regulations 2015.

11. Crime & disorder implications:

- 11.1 Graffiti tagging remains a concern for public assets and the communal bins procured have been assessed and will include an anti-graffiti coating to minimise potential damage.

12. Conclusion

- 12.1 A phased approach to the introduction of the new service causes less disruption and affords the opportunity for learning before introducing the subsequent phases. This reduces the risk of service failure in too many areas where it might be possible to recover in a satisfactory timeframe and increased costs.



Supporting Documentation



1. Appendices:

1. Specialist secure communal food waste bin

Appendix 1

Preferred food waste equipment options

Equipment	Type	Advantages	Insights / evidence / justification
Kitchen caddy	Preferred option: Compost Bag UK 5 litre caddies 	<ul style="list-style-type: none"> - Space saving, ideal for smaller kitchens, in flats or smaller households - Lighter and easier to carry when full - Encourage frequent emptying, reducing odour/mould build-up - More cost effective - Lid locking handle 	<ul style="list-style-type: none"> - Suitable for smaller yield of food waste like B&H, - Also suitable for flats which have limited space in their kitchen, used without issue by Portsmouth CC (since 2019, previously used a different model) - Westminster City Council, tried both 5L and 7L but the 5L is more requested among the residents - Being used in Portsmouth CC and have provided feedback it is working well
Kerbside caddy	Preferred option: Compost Bag UK 23 litre caddy 	<ul style="list-style-type: none"> - Smaller and lighter, operatives can easily handle and empty, improve efficiency during collections - Recommended by WRAP - Lid locking handle 	<ul style="list-style-type: none"> - Suitable for smaller yield of food waste like B&H - Less space needed on the kerbside particularly for households that already have residual bin and recycling bin and glass box - Portsmouth CC, feedback that efficiency increased with smaller caddies, requiring less frequent emptying and is working well.
Caddy liners provision	Preferred options: Provide bin liners with caddies	<ul style="list-style-type: none"> - Hygiene and cleanliness, preventing direct contact with the bin and reducing odours, spillage, and potential contamination - Convenience, residents find it easier to manage food waste when provided liners as they can tie up and put it on the kerbside caddy/communal bin without the need cleaning or rinsing of the caddy - Reduced mess and maintenance, particularly for communal food waste bins, simplify emptying bins and prevent food residue from sticking inside bins/caddy - Increased participation, may encourage more residents to participate, eliminates barriers related to hygiene and inconvenience - Cost effectiveness, initial costs may result in long-term savings by reducing need of additional cleaning and maintenance, from higher participation, diverting residual to food waste 	<ul style="list-style-type: none"> - Meets standard required at processing facility

		<ul style="list-style-type: none"> - Easier collection for crews, food waste doesn't stick to caddy - Cleaner vehicles, spillages and leakages can be reduced, and vehicles can be kept clean 	
Shared bins for flats	<p>Preferred option: Wheeled bin with foot pedal frame (SSI Schaefer)</p> 	<ul style="list-style-type: none"> - Foot pedals allow residents to tip without touching the bins - Can be fitted with the lockable aperture that can reduce contamination (which also can be customised for the size and shape) - Can come with the security frame that can rivet to the ground, at an additional cost 	<ul style="list-style-type: none"> - Can be operated touchless using pedals, avoid mess that might emerge - Having aperture (customised) to avoid contamination - Most common size is 140 litre wheeled bin
Communal bin housings	<p>Preferred option: Storm</p> 	<ul style="list-style-type: none"> - Soft closing lid - Foot pedal is removable if we don't want it - Small aperture plates available to avoid contamination - Can be fixed to ground, unit is 136 kg - Opening from front or back with slam lock system - Can be retrofit for 140L bins for the inside - Door supported with brace for the strength - User friendly to operate (crew and resident) - Grab handle for extra support (e.g. elderly) - Interchangeable panels for easier refurbishment - FOC for demonstrations and trials - Provides additional anti-graffiti paint, add cost £25 per unit - Can offer restrictor plate any shape or size which can reduce contamination risk - Partnered with JETT, for distribution and installation - The unit is using hot-dip galvanised steel so doesn't need any additional measures - Strong build quality and panel is interchangeable 	<ul style="list-style-type: none"> - Being used by Hackney, Aberdeen, Waltham Forest - Hackney: Storm provided bins for trial, for flats above shops, and feedback these are working well <p>Product comments and feedback from projects team testing:</p> <ul style="list-style-type: none"> - Lid is smooth and rust-free; aperture size is optimal for loading food waste liners? or even without it. - Lid has slow closing and is accessible. - Foot pedal is sturdy and protected from the possible food waste scrap - Easy to use and mechanism seems to be last long.

Brighton & Hove City Council

Cabinet

Agenda Item 209

Subject: Housing Safety and Quality Compliance Update

Date of meeting: 15th May 2025

Report of: Cabinet Member for Housing & New Homes

Lead Officer: Name: Corporate Director for Homes & Adult Social Care

Contact Officer: Name: Martin Reid

Tel: 01273 293321

Email: martin.reid@brighton-hove.gov.uk

Ward(s) affected: Wards

Key Decision: No

For general release

1. Purpose of the report and policy context

- 1.1 This report provides a six-month update on our housing safety and quality compliance progress following the Regulator of Social Housing's (RSH) regulatory judgement of August 2024. It forms part of our quarterly reporting cycle to Cabinet and Scrutiny and responds to enhanced consumer regulation requirements introduced in April 2024.
- 1.2 This report follows previous Housing, Health & Safety Update reports considered by the Housing and New Homes Committee in June 2023, September 2023, January 2024 and March 2024, by Cabinet in June 2024 and September 2024, and by Place Overview & Scrutiny Committee (with People O&S members in attendance) in September 2024 and January 2025.
- 1.3 A feature of this report is a new comprehensive root cause analysis, which explores the underlying reasons for previous compliance failures and systemic challenges, to inform a sustainable improvement plan.
- 1.4 The root cause analysis is intended as a platform for organisational learning, culture change, and shared ownership. It is not only a technical submission to regulators - it is a reflective account for residents, staff, and elected members of how the council got here, our learning and how we will move forward.
- 1.5 This report aligns with the outcomes in the Council Plan (2023 to 2027) of Homes for Everyone, and A responsive Council with Well-Run Services.

2. Recommendations

- 2.1 That Cabinet note and comment on the progress made in addressing the issues identified by the Regulator of Social Housing.
- 2.2 That Cabinet note and comment on the findings of the root cause analysis.
- 2.3 That Cabinet note and comment on the next phase of co-producing a service-wide improvement plan.

3. Context and background information

C3 Regulatory Judgement

- 3.1 Brighton & Hove City Council has faced significant challenges in maintaining compliance with housing safety and quality standards. These challenges were highlighted in the Regulatory Judgement issued by the Regulator of Social Housing (RSH) on 9 August 2024 to confirm a consumer grading of C3. The judgement identified serious failings in the council's performance against the Safety and Quality Standard, including a backlog of routine repairs, which were in line with the enhanced consumer regulation introduced post-Grenfell in April 2024.
- 3.2 Since the judgement, the council has entered a period of intensive engagement with the RSH. This includes monthly monitoring meetings and structured updates on the delivery of our health & safety compliance programme and repairs recovery plan. Updates are provided to Cabinet and Place Overview & Scrutiny Committee to ensure ongoing oversight and accountability.
- 3.3 As part of our formal response to the RSH judgement, the council has undertaken a comprehensive root cause analysis. This work supports our improvement planning and is intended to ensure that the drivers of and learning from non-compliance are fully understood and addressed. Further detail on the root cause analysis, including key findings and how it informs our long-term improvement programme, is set out in Section 4 and Appendix B of this report.

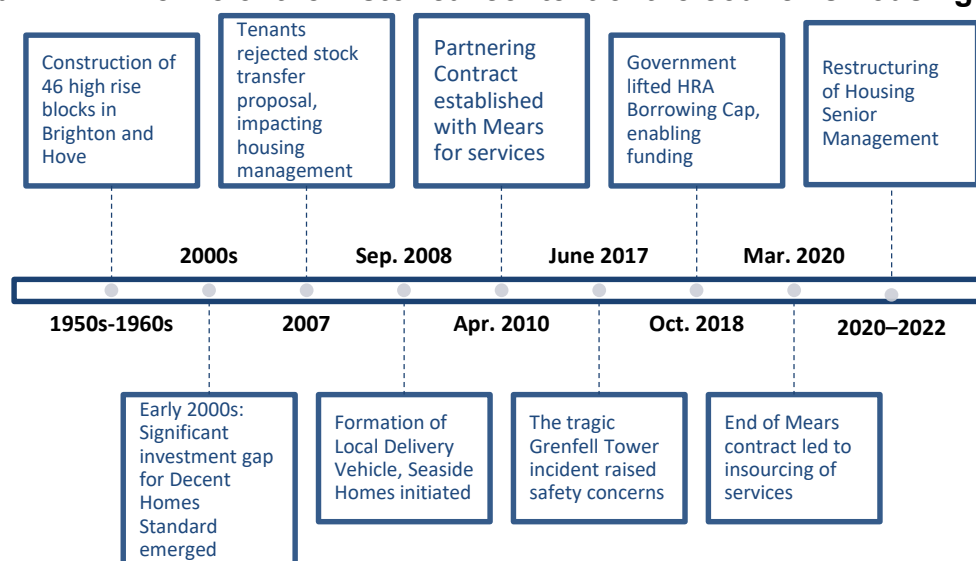
The historical context of the council's housing stock

- 3.4 The council's social landlord duties cover 12,145 rented properties and 2,210 leasehold properties (January 2025). This includes 46 high-rise blocks, of which eight are Large Panel System (LPS) buildings. These LPS blocks, constructed primarily in the 1950s and 60s, do not currently meet modern safety standards. In response, the council has put in immediate safety measures and is considering long-term solutions such as refurbishment or regeneration. Engagement with residents to discuss safety measures and future plans for these blocks is ongoing.
- 3.5 Flats and maisonettes represent 65 percent of the council's rented homes (including Seaside Homes). These building types typically require more intensive compliance activity, particularly in relation to fire, water, electrical,

lift, asbestos and structural safety in shared or communal areas. The remaining 35 percent of the stock consists of houses and bungalows, which present fewer compliance challenges. The council also retains freehold responsibility for more than 2,000 leasehold properties located within blocks of flats, further increasing the proportion of homes where additional compliance duties apply.

- 3.6 Much of the current housing stock was developed during periods of high demand and less stringent regulation. 62% of council rented homes were built before 1966, with 23% built before 1946 (figures include Seaside Homes) Over time, budget constraints have contributed to a historic underinvestment in planned maintenance, improvements and long-term asset resilience. This has left the council owning and managing a significant number of ageing properties that were not designed or maintained to meet current health and safety regulations or quality and sustainability standards.
- 3.7 Further details on the historical context, including policy and investment context and decisions over the past several decades, are set out in Appendix B (paragraphs 2 to 13) and summarised in the diagram below.

Diagram 1: Timeline of the historical context of the council's housing stock



The current context of the council's approach to improving the quality of housing stock and experience of residents

- 3.8 The council has made several structural and organisational changes over the past two years to create the conditions for sustained improvement. These include the adoption of a new Council Plan in July 2023, which placed housing at the heart of the city's priorities; the move to a Cabinet governance model in May 2024 to enable more joined up decision making, and a senior leadership redesign in January 2025 that introduced new Corporate Director and Director-level roles focused on improving and increasing homes and ensuring compliance. The organisational redesign supports a more stable, accountable, and connected organisation capable of building a learning culture, embedding consistent governance, and sustaining long-term progress.

- 3.9 The council's commitment to addressing these issues is reflected in the development of the "Creating Great Homes Together" programme, which brings together multiple improvement plans into a single, coordinated programme of activity by July 2025. This programme will be monitored by senior leaders together with the Cabinet Member for Housing and New Homes.

4. Analysis and consideration of other options

Progress in Housing Safety & Quality compliance

- 4.1 The RSH judgement identified that Council failed to meet health and safety regulatory requirements in the following areas: electrical safety; provision of smoke detection; water safety; and fire safety actions. Additionally, there was a significant backlog in routine repairs. These failings necessitated substantial improvement.
- 4.2 Appendix A provides a progress update as of March 2025 covering detailed compliance data including key indicators such as fire safety, gas safety, water safety, routine repairs, and lift servicing.
- 4.3 Officers meet monthly with the Regulator for Social Housing and discuss progress in relation to safety and quality compliance, including sharing of data in Appendix A . Paragraphs 4.4 to 4.23 highlights the information where compliance challenges remain and are discussed in detail with the Regulator.

Water safety

- 4.4 The council has faced challenges in reporting against indicators related to water safety. In response, the approach has shifted from systems-based reporting to building- level reporting. This better reflects how service is managed in practice – one risk assessment per building - and is simpler to track and validate. . The council will continue to monitor water systems annually, in line with the requirements of the Tenancy Standard Measures (TSM) set by the Regulator for Social Housing.
- 4.5 All Risk Assessments for Higher Risk properties are complete and the focus is now on medium-risk properties, where access and data validation remain challenges.. The council is currently completing 12–15 new assessments per week, below the target of 40. To improve delivery rates expansion of contractor capacity is being progressed to achieve full compliance by December 2025. Additional staffing resources have also been focused on this area of compliance.

Fire safety

- 4.6 In 2024, the council completed a large number of Fire Risk Assessments (FRAs) in a compressed timeframe. It is best practice to undertake FRAs for High Rise blocks every year. In 2025, a more phased approach has been

adopted, with assessments scheduled from January to September. This change supports better planning and coordination of both assessments and resulting remediation actions.

- 4.7 Although the total number of Fire Safety remediation actions remains high, progress continues to be made. As of April 2025, the backlog of FRA-related actions has been reduced to 6,420.
- 4.8 The 2025 round of FRAs for high-rise buildings is providing clearer insights in to recurring safety themes across our stock. In parallel, work is underway to update our Programme Plan and build a more robust estate-by-estate strategy that better reflects building risk, resident impact, and regulatory expectations.
- 4.9 Delivery remains heavily reliant on external contractors due to limited internal fire expertise. There is also lack of capacity to respond flexibly to different regulatory requirements and fully embed risk-based planning such as the Fire Risk Prioritisation Tool. To address this and aligned to an additional £1.1m revenue investment in health and safety compliance in the 2025/26 HRA Budget, including new staff resources, the council is establishing two dedicated fire remediation teams – one for Thematic (eg door replacement, common way ventilation, and signage) planned works and one for an estate-based approach (based on property type location) . These teams will drive targeted delivery, improve oversight, and ensure progress across all building types, including those that may otherwise receive lower prioritisation. These teams will help us move from reactive compliance to a more structured, accountable and proactive model that meets regulatory expectations.

Bristol Estate

- 4.10 On 18 March 2025, East Sussex Fire and Rescue Service (ESFRS) carried out a fire safety inspection at Hazel, 1–24 Turton Close. The council-commissioned FRAEW (Fire Risk Appraisal of External Walls) identified a high level of risk, and ESFRS advised that elements of this were incompatible with the existing 'Stay Put' evacuation strategy. In line with a more formal and robust approach by ESFRS, all ten high rise blocks on the Bristol Estate have now received SF21 record of inspection letters and formal Enforcement Notices. These required a temporary move to simultaneous evacuation until key remediation actions relating to stairwell spandrel panels were completed and verified.
- 4.11 As of 2 May 2025, remediation works have progressed sufficiently on five of the ten blocks - Hazel, Allamanda, Jasmine, Meadowsweet, and Sorrell – for ESFRS to confirm a return to the remain in place evacuation policy. Works are ongoing.
- 4.12 The council has taken a comprehensive approach to managing this incident. Immediate actions included:
 - Maintaining 24/7 waking watch and moved to simultaneous evacuation across all 10 affected blocks.

- Delivering individual letters and holding resident drop-ins to provide clear communication and reassurance.
 - Completed enhanced tenancy visits for 94 percent of the 248 households affected, with 4 scheduled visits, 3 void, and 7 households where we have not been able to agree access and therefore, they have all been sent enforcement notice letters as part of our continued attempts to engage them.
 - Commissioning urgent remediation of spandrel panels, 5 blocks have now had spandrel panels replaced: Hazel; Allamanda; Jasmine; Meadowsweet; and Sorrell.
 - Beginning planned upgrades to escape route ventilation and fire door replacements.
 - Submitted Mandatory Occurrence Reports (MORs) to the Building Safety Regulator (BSR) for all affected blocks.
- 4.13 The council has refreshed the Fire Risk Prioritisation Tool for high-rise blocks, as requested by ESFRS. Officers are updating the related Programme Plan, and embedding it within our formal governance structures, including the Housing Safety & Quality Assurance Board to ensure ongoing oversight.
- 4.14 Internal resources have been reallocated to strengthen fire safety leadership, with the appointment of an Acting Head of Fire Safety and recruitment underway for additional posts.
- 4.15 The Bristol Estate response was treated as a critical incident. A Strategic Coordination Group (SCG), chaired by our Corporate Director, is currently meeting thrice-weekly to coordinate the response across the directorate and the wider council. The council is also scheduling a lessons learned session (and monthly thereafter until our response is stepped down) to identify any areas for improvement in our historical and current processes, which will feed into the wider root cause analysis, learning and subsequent continuous improvement plan for Being a Great Landlord.
- 4.16 Although currently focused on Bristol Estate, the council is actively assessing the implications across the wider portfolio. Simultaneous evacuation and waking watch measures have been extended to St James House, Conway Court and Livingstone House, blocks with similar issues to those identified on Bristol Estate, with MORs submitted for each. Drop-ins and enhanced tenancy visits are underway at these locations.
- 4.17 As a precautionary measure, waking watch is also in place for Nettleton Court & Dudeney Lodge. A decision on evacuation strategy will be made following receipt of updated Fire Risk Assessments.
- 4.18 The council's experience responding to the Large Panel System (LPS) blocks provided valuable learning that has shaped the approach to Bristol Estate. In response to the LPS emergency, the council developed a comprehensive communication strategy and engaged thoroughly with stakeholders, ensuring transparency, accountability and community involvement. This approach was mirrored in the Bristol Estate response. The

proactive measures, including enhanced tenancy visits, regular resident meetings and clear communication, helped to reassure residents. The council's ability to adapt and implement lessons learned from previous incidents underscores our commitment to being a learning organisation, maintaining high safety standards and fostering trust within our resident community.

Repairs Backlog

- 4.19 Addressing the routine repairs backlog has been a key priority following the Regulatory Judgement of August 2024. At its peak, the backlog had a significant impact on resident experience. While lower risk, many of the delayed jobs were longstanding and complex, reflecting wider capacity, resourcing, and systems issues within the service.
- 4.20 The council has made substantial progress in reducing the overall volume of open repairs. This has been achieved through targeted planning, contractor mobilisation, and a clear focus on both risk prioritisation and clearing the oldest cases. This recovery work continues to be closely managed and monitored.
- 4.21 Headline performance indicators - such as average repair completion times - do not yet reflect the level of progress made. This is due in part to the decision to prioritise older, more complex jobs, which have inflated time-based measures. In parallel, data cleansing and system closure activity is being carried out to resolve historical records that were masking operational progress. This work is essential to ensuring that reporting is robust, accurate, timely and fit for ongoing regulatory scrutiny.
- 4.22 While the council is confident that compliance can be reached by late July 2025, we remain alert to the risks of operational slippage, unexpected demand, or data integrity issues. Continued attention is being given to embedding good practice, addressing root causes of the backlog, and putting in place stronger foundations for long-term performance and resident confidence.

Root cause analysis of non-compliance

Purpose and approach

- 4.23 The Regulator of Social Housing (RSH) requires the council to undertake a root cause analysis as part of our response to the C3 Regulatory Judgement. This analysis seeks to understand why the council did not fully comply with the RSH Safety and Quality Standard and how to ensure failings are not repeated. This is outlined in Appendix B, with the main points highlighted in this Cabinet report.
- 4.24 The findings go beyond operational errors to highlight systemic and cultural challenges that have built up over time. While some actions have already been taken, the analysis has created a clearer picture of what needs to

change – structurally, culturally and in day-to-day delivery – to achieve lasting compliance and better serve residents.

- 4.25 Our objective is to address the systemic challenges that have contributed to non-compliance and to ensure that all residents live in safe, high-quality homes. This is in line with: our Council Plan (2023 to 2027) priorities Homes for Everyone, and A responsive Council with Well-Run Services; Housing Strategy (2024-29) priority of Improving Housing Quality including by: investing in building and fire safety to meet duties under the Building Safety Act; ensuring the Council complies with social housing regulations; and reducing the backlog of housing repairs.
- 4.26 The root cause analysis in this report has used three main sources of insight:
- Information and data review: including compliance performance, resident feedback, historic audit trails, and complaints.
 - Interviews: structured conversations with Housing leadership, corporate colleagues and compliance leads, service managers, and technical experts.
 - Structured Workshops: Facilitated using the 'Five Whys' reflect deeper than the symptoms for non-compliance.
- 4.27 The Council continues to engage in deep reflection about our learning in terms of our response to the Regulatory Judgement, emerging events and our actions to address the identified issues and ensure ongoing compliance. Continuous improvement means that the analysis is an ongoing process as a tool for shared learning and a starting point for building the improvement plan together with our Housing and relevant corporate teams, residents, and elected members.

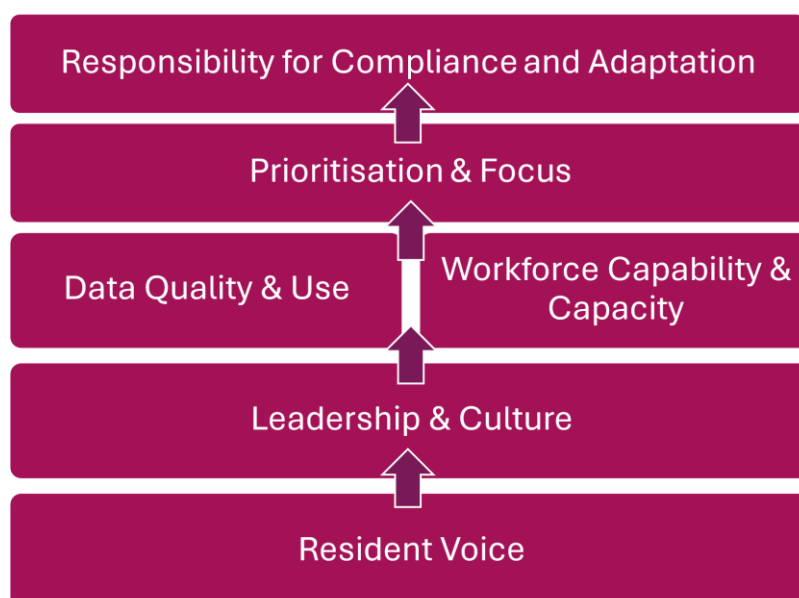
Summary of what the Root Cause Analysis Tells Us

- 4.28 Our root cause analysis identifies six interdependent themes, presented in the diagram below as a layered system:
- At its foundation lies Resident Voice, where a hierarchical culture focused on national policy initiatives and organisational priorities was not always responsive to resident concerns.
 - Leadership & Culture provides the platform for effective governance and decision-making; however, organisational culture sometimes disempowered staff, created psychological unsafety, delayed escalation of issues, and diluted responsibility for managing risk through ambiguity and fragmentation.
 - Data Quality & Use is critical to sustainable compliance but was undermined by inconsistent maintenance of records, poor data quality, and systems that did not communicate or integrate effectively – weakening assurance about stock condition, maintenance and investment activity, and long-term decision-making.
 - Workforce Capacity & Capability is essential for action; however, key roles were at times unfilled or underpowered, and frontline staff did not consistently feel empowered to escalate concerns or act confidently.

- Prioritisation & Focus ensures that resources are aligned with long-term asset and compliance resilience; however, short-term decisions, limited forecasting, and underinvestment undermined the council's ability to strengthen these areas.
- Responsibility for Compliance and Adaptation requires proactive monitoring and response to emerging risks; however, a reactive compliance model missed early warning signs and did not adapt quickly enough to new duties and standards.

4.29 In practice, while elements of this system were in place, inconsistency across these layers contributed to vulnerabilities. Strengthening each layer and reinforcing the links between them is critical to embedding lasting improvement.

Diagram 2: Mapping of causes leading to non-compliance and backlogs



4.30 These are not isolated themes. They interact and reinforce one another: incomplete and poor quality data undermines decision-making; unclear roles delay action and escalation; short-term fixes crowd out strategic planning. The entire system depends on coordination, learning, and shared responsibility. Using the themes as a framework helps us move beyond individual failures – to address the deeper conditions that have enabled non-compliance to arise – and to design change that lasts.

Next steps: from analysis to action

- 4.31 The root cause analysis builds on actions taken so far and the shared commitment to understand what must change to support a consistent focus on compliance in terms of safety, sustained maintenance and proactive investment in the quality of the housing stock, and a steadfast commitment to resident-centred planning and delivery.
- 4.32 To inform the alignment of improvement plans for our Creating Great Homes Together Improvement Programme, the six themes from our root cause

analysis have been reframed as priorities for organisational change. We are adopting a strengths-based approach that focuses on learning from and addressing areas for development, as well as systems that support us to be a great landlord.

- 4.33 The themes are reimagined below in terms of what we aim to become over the coming months:
- Leadership and culture: We will ensure consistent, robust leadership and clarity around when and how concerns are escalated, so that issues are surfaced early and addressed decisively.
 - Data quality and use of data: Reliable, well maintained electronic records will underpin planning, assurance and sound decision making. Strong management systems and procedures will safeguard the accuracy, completeness and quality of our data and its effective use to inform and support compliance and our Improvement Programme.
 - Workforce capacity and capability: Skilled, confident staff are our most valuable resource. We will: invest in staff development including apprenticeships, technical skills, particularly in areas like fire safety, surveying and data analysis; design structures that create capacity for leadership development in all tiers of management; support a culture of trust and empowerment that enables action to be taken and areas of concern to be raised without fear of blame: and, use digital solutions for transactional/administrative activities so that staff have time to plan and focus on relational activities.
 - Prioritisation and focus: With finite resources, we will take a risk-based approach to ensure that effort and investment are aligned to fulfil all of our compliance duties, Improvement Plan and resident impact.
 - Responsibilities for compliance: We will define clear roles and accountabilities for stock quality, safety and compliance. Risk management must move beyond silos. Joined-up teams, and meaningful resident involvement will strengthen trust and meaningful engagement between staff and residents.
 - Managing contracts: We will take a stronger client role, ensuring contractors are clear on expectations. Given the scale of works required to maintain and improve the council's housing stock, there will be times that third parties will be required in terms of capacity and/or expertise to support the council in fulfilling its compliance duties. A strong client function should first clearly scope out the requirements for the contractor about what we need in terms of their services, and then the specification and terms and conditions in the contract/s must be actively managed. Robust contract management ensures that the direct (specified works) and indirect (social value) benefits from the contracting arrangement are realised for the residents and wider community.
- 4.34 Our goal is not only to meet regulatory expectations but to create a culture and system change that supports staff to listen to and work proactively with a diverse range of tenants and leaseholders so that our residents live in safe, and good quality homes and neighbourhoods.
- 4.35 Our approach to finalising the improvement programme includes:

- Workshops for resident and staff, co-producing together the responses to the issues raised in this report
- A one council approach to learning within cross-cutting themes (e.g. data, contract management, asset planning) to test and learn identified solutions
- The programme will be overseen by the Housing Compliance Board for operational delivery, and strategic oversight will be by the directorate's Delivery and Improvement Board which is being created to include frontline staff as part of the membership.

4.36 The Improvement Programme will be co-produced by July 2025 under the leadership of the Corporate Director for Homes and Adult Social Care.

5 Community engagement and consultation

- 5.1 The Council has actively and extensively engaged with residents and listened carefully when discussing safety measures and future plans for LPS and Bristol Estate high-rise blocks.
- 5.2 The Directorate held workshops with residents and staff to collaboratively find solutions to frequently reported issues. Customer insights from complaints, member enquiries, and ombudsman findings were analysed, identifying key areas for improvement. These workshops were well-received, with residents expressing enthusiasm about the meaningful opportunity to influence service changes.
- 5.3 The service improvement programme is being co-produced with residents, rather than engaging them separately from staff. This approach aims to make resident engagement opportunities more accessible and meaningful.
- 5.4 The Community Engagement Team has expanded, including the addition of a digital communications officer. This expansion aims to diversify resident voices and increase engagement opportunities.

6 Financial implications

- 6.1 This is aligned to HRA budget provisions for 2025/26, which includes £1.1m revenue investment in health & safety to ensure H&S and building safety requirements are met, includes new staff resources to manage and undertake the work required and new Head of Regulatory Compliance role. The budget also incorporates £14m capital investment works on health & safety to continue compliance work already started.
- 6.2 Future budget reports will continue to include these costs, which will be approved on an annual basis. Officers will closely monitor the costs associated with the works outlined and report any variances via the councils TBM process. Consideration will need to be given to the use of general reserves in light of the additional revenue costs arising from having a waking watch across affected blocks, if this cannot be managed as part of TBM.

Finance officer consulted: Michael Bentley Date consulted:29/04/2025

7 Legal implications

- 7.1 This report provides an overview of Brighton & Hove City Council's progress in addressing housing safety and quality compliance.
- 7.2 The Social Housing Regulation Act came into effect from 1 April 2024 and requires social landlords to comply with the standards set by the Regulator of Social Housing (RSH). On 9 August 2024 the Regulator of Social Housing issued a C3 regulatory judgment that there are serious failings in the Council as landlord delivering the outcomes of the consumer standards and significant improvement is needed specifically in relation to outcomes for the national Safety and Quality Standard.
- 7.3 The Regulator expects the Council as landlord to develop a plan that will drive significant change and to share that with tenants. The Regulator has very substantial powers of enforcement available but is not proposing to use enforcement powers at this stage, provided Brighton and Hove CC continues to seek to resolve these issues.
- 7.4 The issues identified in the report are relevant to the Council's ability to meet multiple legal obligations and regulatory standards. As well as the RSH, compliance falls under the scrutiny of the Building Safety Regulator, the HSE and the fire service.
- 7.5 There is the potential for the council to be exposed to compensation claims arising from disrepairs which have not been addressed on a reasonable timescale.

Name of lawyer consulted: Natasha Watson

Date consulted: 29.4.25

8. Risk Implications

- 8.1 Delivery risks include organisational resilience , further unforeseen events that divert capacity, capacity constraints, and shifting expectations. The Housing Revenue Account (HRA) budget, Medium Term Financial Strategy (MTFS), indicates a growing underlying deficit in the HRA and identifies mitigations that can be actioned to address this. These risks will be managed proactively and transparently. Mitigations include taking a one council approach, continued alignment of the HRA budget to compliance duties based on risk-based prioritisation tools, and empowering all tiers of staff to collaborate and maintain focus on compliance as a priority for maintaining safe and high quality stock.

9. Equalities implications

- 9.1 The council is committed to addressing the needs of vulnerable and marginalised groups through an equity-focused approach. Social housing often serves higher proportions of individuals from these communities, including older adults, people with disabilities, and minority groups. By improving housing quality to the required standards, we are not only ensuring safety and compliance but also making a meaningful equity impact,

reducing disparities, and enhancing health and wellbeing for those most affected by systemic inequalities.

10. Sustainability implications

- 10.1 The focus of the report is primarily on housing safety, compliance issues, and the Council's efforts to address these challenges through structural and organisational changes, resident engagement, and systemic improvements and therefore there are no specific references to Net Zero or climate change initiatives.

11. Health and Wellbeing Implications

- 11.1 The quality and safety of housing significantly impact the health and wellbeing of residents. Compliance measures, including improvements in fire safety, electrical systems, and water safety, are integral to creating safer and good quality living environments. These efforts will also support the reduction of health inequalities, particularly for residents affected by fuel poverty or chronic conditions.

12. Conclusion

- 12.1 This report provides a comprehensive overview of Brighton & Hove City Council's efforts to address housing safety and compliance issues. The report highlights the challenges faced by the Council in maintaining compliance with housing safety and quality standards, particularly in high-rise blocks constructed in the 1950s and 1960s. Some of these buildings, the LPS blocks, have been found not to meet current safety standards, prompting immediate safety measures and long-term solutions such as refurbishment or regeneration. The Council has actively engaged with residents to discuss safety measures and future plans for these blocks. Other properties require significant investment to ensure they are brought up to and maintained to comply with current, more stringent, legislative and regulatory requirements and meet our priority of improving the quality of our council homes.
- 12.2 The report also details the Council's root cause analysis approach, which identified systemic issues such as poor maintenance of records, inconsistent planning for workforce and contractor capacity, and a reactive culture that diverted resources to national policy initiatives, organisational priorities or emergencies rather than supporting sustained investment in and delivery of all compliance measures. The analysis emphasises the need for strategic and systemic change, built on a shared understanding of the actions needed to effect change and clarity about individual and collective responsibilities for delivery. The Council has made several structural and organisational changes over the past two years to create the conditions for sustained improvement, including the adoption of a new Council Plan, the move to a Cabinet governance model, and a senior leadership redesign.
- 12.3 Furthermore, the report outlines the Council's commitment to putting residents' voices at the heart of the improvement journey. Workshops with

residents and staff were held to collaboratively find solutions to frequently reported issues, and the feedback was used to inform service changes. The Council aims to align various improvement plans into a single programme of activity by July 2025, monitored by senior leaders together with the Cabinet Member for Housing and New Homes. The report concludes with a summary of the findings from the root cause analysis, highlighting the need for strategic and systemic change to address the identified issues and ensure a resident-focused and resilient commitment to compliance.

- 12.4 This report concludes with a summary of the findings from the root cause analysis, highlighting the need for strategic and systemic change to address the identified issues and ensure a resident-focused and resilient commitment to compliance. These insights are important to inform the future improvement programme for the future quality of council housing and informing the options appraisal about the future of the LPS blocks.

Supporting documentation

1. Appendices

Appendix A: Housing Safety & Compliance KPIs

Appendix B: Root Cause Analysis: Identifying the causes of Compliance Failures

2. Background documents

None

Appendix A: Housing Safety & Compliance KPIs

Table 1: Progress in electrical safety compliance

	Feb 24	April 24	June 24	July 24	Aug 24	Sept 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Direction of travel	Expected date of Compliance
5 Year EICR domestic testing (% of homes)*	42.9%	49.1%	53.0%	55.8%	57.4%	60.1%	63.2% (7,679)	66.4%	67.9%	70.7%	72.6%	75.5%	Green	December 2026
10 Year EICR domestic testing (% of homes)*	66.6%	70.1%	72.0%	73.7%	74.9%	76.4%	78.1% (9,383)	80%	80.9%	82.9%	84.6%	86.7%	Green	
Communal EICRs (% of communal areas)	5.3%	14.0%	20.8%	22.0%	29.4%	33%	37.6%	39.3%	43.9%	45.1%	45.4%	48.5%	Green	December 2026

*No outstanding C1 (immediate danger) and C2 (potentially dangerous) actions. We don't record C1s and C2s as part of a separate inspection programme because as we inspect, we fix (remediate) C1s and C2s.

Table 2: Progress in fire safety compliance

	Feb 24	April 24	June 24	July 24	Aug 24	Sept 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Direction of travel	Expected date of Compliance
FRAs in High Rise buildings (% of buildings)	100%	100%	100%	100%	100%	100%	100%	100%	100%	71.7% (previously reported 63%)	60.9%	30.4%	Red	Sept 2025*
FRAs in Medium Rise buildings: (% of buildings)	99.8%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	Green	Compliant
FRAs Low Rise buildings: (% of buildings)			20.9%	57.0%	78.22%	92.9%	93.5%	99.1%	99.4%	99.8%	99.8%	99.8%	Green	December 24
FRA remediation actions (snapshot number of live actions)	1,748		4,253	6,472	-	8,228	8,142	8,114	8,268	7,554	7,287 (incl. 1108 Best Practice)	6420	Red	December 26**

*We completed a large number of FRAs in a compressed period last year, and are now deliberately staggering them from January to September to manage both assessments and resulting actions more effectively.

** High number of total actions remains a concern, however progress against addressing these has continued.

Table 3: Progress in water safety compliance

	Feb 24	April 24	June 24	July 24	Aug 24	Sept 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Direction of travel	Expected date of Compliance
Legionella Risk Assessments (% of water systems covered)*				79.0%	77.5%	77.5%	78.1%						Red	July 2025***
Water Risk Assessments (% of buildings covered (of 12,672))								52.1% (6,601)	57.1% (7,240)	60.7% (7,693)	61.9% (7,844)	63.4% (8,030)	Red	December 2025

*We continue to face challenges in providing this KPI. We have moved away from "system" reporting in favour of by building. That's more in line with how we manage the service i.e one risk assessment per building and simpler to track.

Table 4: Progress in other areas of compliance raised by RSH

	Feb 24	April 24	June 24	July 24	Aug 24	Sept 24	Oct 24	Nov 24	Dec 24	Jan 25	Feb 25	Mar 25	Direction of travel	Expected date of Compliance
Smoke alarms/detectors (% of homes)	50.8%	77.0%	81.5%	83.6%	86.5%	89.4%	92.9%	94%	95.7%	96.3%	97.5%	97.7%	Green	Oct 2025*
Repairs jobs open for more than 28 days (HRA)	-	-	9,653 (incl. TA &EA)	7,250 (incl. TA & EA)	7,923 (incl. TA &EA)	6599	6222	6578	6,950	5,357	4,399	4,134	Green	July 2025

*100% Compliance is dependent on access. 260 properties remaining with no recorded smoke detection and we have started the informal part of the no access process by writing to these tenants and cold calling. Dedicated resource attending all remaining properties and installing battery smoke detection (or testing and recording existing smoke detection) which will be in place until the property is tested as part of our programme, at which point hard wired smoke detection will be installed.

Table 5: other areas of Safety & Quality compliance (currently compliant)

	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March
Carbon Monoxide Detection / Alarms												
Total detection in domestic dwellings		97.79%			91.4%	96.6%	97.4%	97.3%	97.9%	98.3%	98.6%	98.8%
Gas/Fuel Safety												
Communal Boilers certification in date - annual	100%	100%	100%		100%	100%	100%	100%	100%	100%	100%	100%
Domestic dwellings certification in date – annual	100%	99.97%	100%		100%	100%	100%	100%	100%	100%	100%	100%
Properties with a capped gas supply - reduction in numbers*	77	23	40		32	32	23	24	24	16	28	19
Asbestos Safety												
Common ways – Total rolling compliance	98.53%	98.90%	99.4%	99.8%	90.1%	99.6%	97.0%	98.4%	99.8%	100%	100%	100%
Asbestos Re-inspection programme – Common ways Rate of progress						17.06%	56.70%	83.7%	94.9%	97.9%	100%	100%
Lift Safety (lifts & lifting equipment)												
Communal (Passenger) lifts (LOLER) servicing	100.00%	100.00%	100.0%	100.0%	100.0%	100.0%	100.0%	100%	100%	99.2%	100%	100%
Domestic lift and stair lift, equipment servicing	100.00%	100.00%	100.0%	100.0%	100.0%	100.0%	100.0%	100%	100%	100%	100%	100%

*Most capped gas supplied are tenant-driven, with some void properties capped for safety. Housing Customer Services are conducting welfare checks where tenants have asked for capped gas, working with them to resolve any debt or other issues arising.

Appendix B:

ROOT CAUSE ANALYSIS – IDENTIFYING THE CAUSES OF COMPLIANCE FAILURES

Background and context

1. As a learning organisation, this section seeks to reflect the history of the buildings and their maintenance, as well as the recent transitions and surface the systemic conditions. This understanding will provide foundations for continuing our endeavour for sustainable, long-term systemic change and ensure our commitment to compliance is resident-focused and resilient.
2. The council has an ageing housing stock with 23% of rented homes built before 1946 and an overall 62% of rented homes built before 1966. Only 38% of all rented homes were built after 1965 with 6% built post 1991. The council also has a significantly higher number of flats and maisonettes, which are subject to more stringent compliance regulations, at 65% of rented dwellings, compared to houses and bungalows at 35% of rented dwellings. (Total figure of 12,683 homes as of 8th April 2025 include the 499 Seaside Homes dwellings).
3. There are 46 high rise blocks in Brighton and Hove of which 8 are Large Panel System (LPS) blocks. The high rises were mainly built during the 1950s and 1960s, this construction method was popular for multi-storey residential buildings. LPS buildings consist of reinforced floor and roof structures supported by precast concrete large panel walls. However, national concerns have emerged over the years due to the risk of partial or complete collapse in certain circumstances inherent in this method. Many LPS buildings across the country, including those in Brighton and Hove, have been found not to meet current safety standards. Brighton & Hove City Council has taken steps to address these concerns, including implementing immediate safety measures and planning long-term solutions such as refurbishment or regeneration. The Council has also engaged actively with residents to discuss safety measures and future plans for the LPS blocks.
4. The Right to Buy policy, introduced in 1980 widened access to home ownership to many households who would otherwise not have had the opportunity to purchase their own home. However, over the years, while the sale of council homes generated substantial capital receipts, varying percentages of the receipts was directed to the Treasury, with loss of rental income from sold properties, leaving councils like Brighton and Hove with limited funds to reinvest in new housing and existing council homes. The policy also led to a reduction in the availability of social housing. With the sale of council homes far outpacing the construction of new ones, the supply of affordable housing available to councils did not kept pace with the need for affordable housing. There was also a lack of sufficient investment in new social housing, as funds were often diverted from a capital to a revenue subsidy to cover housing benefit costs instead. The cumulative effect of these factors has been a long-term financial strain on councils. This, combined with the reduced ability to replace sold homes, limited councils' capacity to address housing needs effectively and invest in their own council dwellings.

5. In the early 2000s, the council faced a significant investment gap, preventing council homes from meeting the Government's Decent Homes Standard. A large-scale stock transfer was proposed as a means to bring in sufficient investment to meet this Decent Homes investment requirement. This option was overwhelmingly rejected by Brighton & Hove City Council tenants in the 2007 stock transfer ballot. Following the ballot, officers reviewed strategic housing options to reflect the decision that the stock would be retained by the Council and to fund the investment gap to achieve the Decent Homes Standard and meet tenant aspirations for improvements to the stock.
6. Two key approaches were followed:
 - a. A Procurement Strategy to deliver a 10-year Partnering Contract with Mears from April 2010 for the maintenance and improvement of the council housing stock, aiming to reduce overheads and direct costs. The Partnering Contract also delivered planned and major works. This arrangement ended in March 2020, when the Housing Repairs and Maintenance service was insourced, coinciding with the onset of the Covid-19 pandemic.
 - b. An Asset Management Plan to establish a Local Delivery Vehicle (Seaside Homes) in 2008, using HRA assets requiring reinvestment to leverage additional investment in the council's housing stock, funding refurbishment of the homes leased to Seaside and providing a capital receipt toward meeting the Decent Homes Standard.
7. During the 2000s and 2010s, the council's housing strategy was shaped heavily by the Decent Homes Programme, which drove significant improvements, including in the quality of kitchens, bathrooms, and thermal comfort. In response to resident feedback that the national Decent Homes Standard was too basic, the council developed the Brighton & Hove Property Standard to aim for a higher local standard.
8. There was, and continues to be, a strong focus on gas safety and meeting compliance standards, delivered through both the Mears Partnering Contract and other specialist contractors.
9. At the same time, the regulatory environment changed significantly. The abolition of the Audit Commission's inspection regime in 2012, as part of Government efforts to reduce public bodies and compliance costs, removed a layer of external scrutiny. The end of comprehensive area assessment further limited oversight of compliance risks in local authorities, reducing independent challenge during this period.
10. Following the Grenfell Tower tragedy in June 2017, significant strengthening of the legislative and regulatory framework transformed the compliance landscape. Housing services now face a more stringent regulatory environment, with enhanced powers and new duties held by the Regulator of Social Housing, the Building Safety Regulator, East Sussex Fire & Rescue Service, and the Housing Ombudsman.
11. In October 2018, the Government lifted the Housing Revenue Account (HRA) Borrowing Cap. The financial situation at that time was such that the authority could not provide sufficient resources to achieve the full extent of investment required in our council homes. Prior to the self-funding settlement there were significant investment pressures, both revenue and capital across the HRA.

12. In March 2020, the Partnering Contract with Mears ended, and the council insourced the Housing Repairs and Maintenance service. The transition coincided with the outbreak of the Covid-19 pandemic, which compounded operational pressures. Staff were transferring to a new employer while adapting to pandemic-compliant ways of working. Despite rapid mobilisation efforts, significant backlogs in routine repairs emerged during this period as well as pandemic related delays in procuring new planned and major works and other contracts.
13. Subsequently, the council had issues with engaging contractor resources for both our Repairs & Maintenance Service and our Housing Investment & Asset Management service, including to undertake major capital works. The construction market was suffering from several pressures including inflation, employment issues and high-credit costs. These pressures resulted in a large number of construction related businesses becoming insolvent and going into administration. Contractors were therefore becoming more selective with projects they would undertake which required the council to procure additional contractor capacity.
14. Organisationally, a significant restructuring of Housing Senior Management was undertaken between 2020 and 2022 with the creation of the Housing Management Service, new Assistant Director and Heads of Service roles. These changes were in anticipation of the new, more rigorous regulatory environment introduced through the Social Housing Regulation Act 2023.
15. Technologically, the service historically relied on a range of ICT systems, including the Mears works management system (MCM) and materials supply chain system (MEPOS), as well as the council Asset Management system (APEX), and the NEC Housing Management System (NEC-H). These systems were not integrated, and record-keeping within individual systems was inconsistent, hampering the ability to manage risk and provide visibility or assurance about compliance. A new Asset Management System was approved in September 2021 and introduced in 2024. The council has also procured and mobilised a new materials supply chain and is moving away from use of the Mears works management system toward use of NECH.

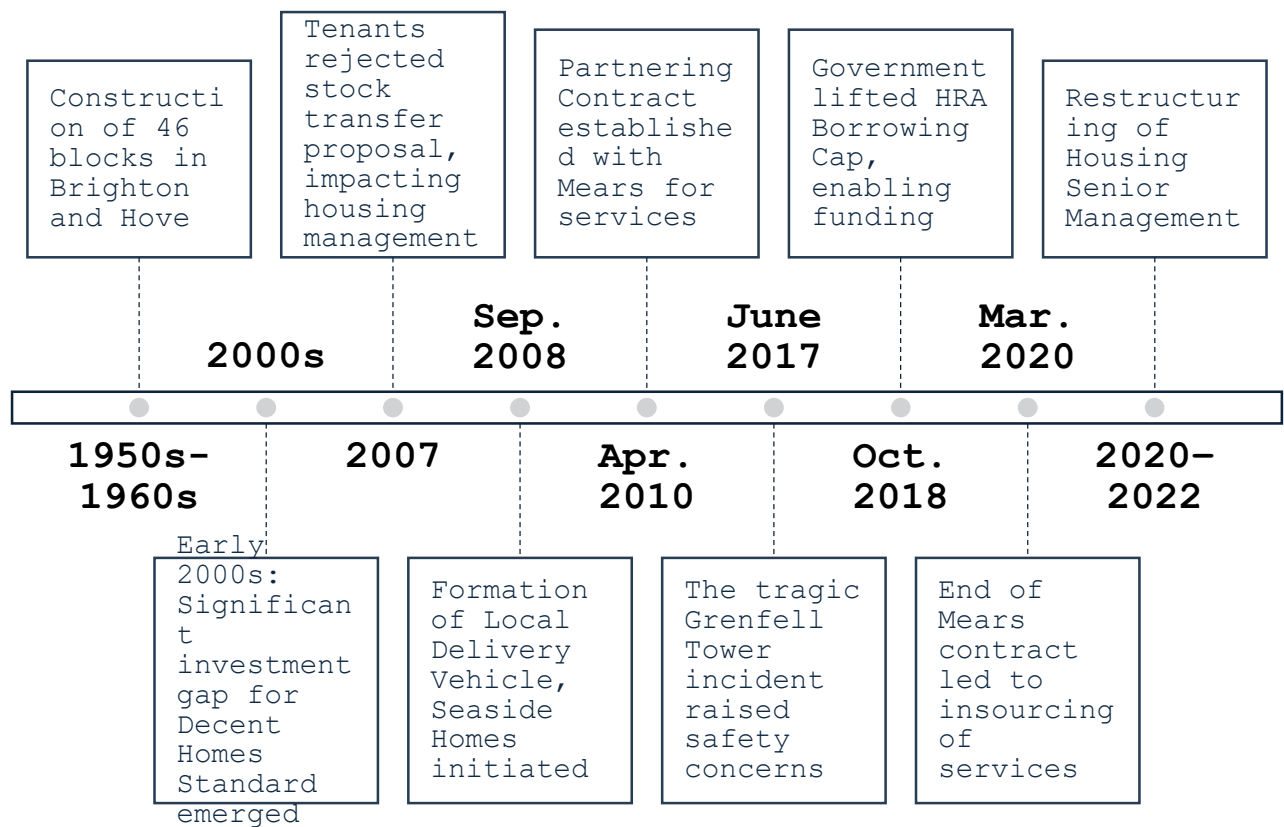


Diagram 2: Chronology of BHCC's housing stock

16. In July 2023, the council launched a new Council Plan including three key priorities: sustainable and inclusive economic growth; tackling the housing and homelessness crisis; and improving the look and feel of the city. The Council Plan and purpose creates leadership that connects and brings critical resources together to address key issues.
17. In May 2024, the council moved from a Committee system to a Cabinet model. This change was designed to support more timely, joined-up decision-making while preserving transparency and public engagement. The cabinet member for Housing New Homes has attended the overview and scrutiny committee meetings for People and Place to ensure that there is visibility about the council's response to its compliance duties.
18. In January 2025, the council implemented a senior leadership restructure following extensive engagement. This included the creation of a Corporate Director for Homes & Adult Social Care and a Director of Homes & Investment, strengthening strategic oversight of council housing stock, focus on compliance as well as the supply of additional council homes. The restructure was designed to support the one-council approach and its new way of working in terms of being a more connected and learning organisation, has helped align housing compliance actions with wider corporate responsibilities.
19. The directorate is committed to putting our residents' voices at the heart of our improvement journey. To achieve this, we held workshops with residents and staff to collaboratively find solutions to frequently reported issues. Customer insights were

analysed from complaints, member enquiries, and ombudsman findings, identifying four key areas for improvement. This feedback was used in workshops where residents and staff came together to discuss the themes identified from the analysis. A total of 18 residents and 15 staff members participated in the workshops. The workshops were well-received, with residents expressing enthusiasm about the meaningful opportunity to influence service changes.

20. The services changes will be part of a programme of improvement that will help the council to become a Great Landlord: 'A great landlord where residents know that they are valued, treated with respect; and the staff who work with and for residents are empowered and given the time to be creative and kind.'

Themes and their causes

21. This section of the report sets out each theme that led to non-compliance –how the non-compliance manifested itself, why it happened what we learned, actions already taken, and future actions that will lead us to be a Great Landlord.
22. The following table synthesises cross-cutting themes that emerge repeatedly. Each theme reflects overlapping system weaknesses and offers a lens to frame improvement activity. This is a strategic map of where misalignment occurred, and where the greatest leverage for change now lies. These themes, and their overlaps, should inform the structure and sequencing of the Service Improvement Plan.

Table 1: Themes of non-compliance

Theme	Description
Resident Voice	A hierarchical culture focused on national policy initiatives and organisational priorities was not always responsive to resident concerns
Leadership & Culture	Organisational culture sometimes disempowered staff and made them feel psychologically unsafe to share concerns or ideas Ambiguity and fragmentation delayed decisions and diluted responsibility for managing risk.
Data Quality & Use	Inconsistent maintenance of records, poor data quality and systems that do not speak to or integrate with each other undermined knowledge about the status of our stock, assurance about maintenance activity, investment priorities and proactive long-term decision-making.

Workforce Capacity & Capability	Key roles were vacant or held by staff who in some cases lacked the relevant competency, experience or ownership of issues; and some staff did not always feel psychologically safe or empowered to escalate or act confidently.
Prioritisation & Focus	Short-termism, limited forecasting, and underinvestment weakened long-term asset condition and compliance.
Responsibility for Compliance	Leadership was reactive in terms of compliance, failed to fully respond to, and adapt quickly enough to changing duties and standards.

1. Resident Voice

What this looked like:

- Engagement often consultation, rather than co-production
- Relatively low resident numbers participating in engagement opportunities
- Those that did engage did not reflect the demographics of residents across our homes and neighbourhoods
- The operation of service was not sufficiently informed by learning from resident feedback.
- Organisational learning from resident complaints, particularly repeated complaints on the same issues, was not identified as a red flag.

Why it happened:

- Reliance on traditional approaches to resident engagement that do not reflect 21st century consumer expectations
- Capacity of the team encouraged reliance on what had previously worked rather than being creative and responsive to the preferences of the current resident profile

What we learned:

- Improvements are required to make resident engagement opportunities more accessible and more meaningful.
- We need to increase opportunities for staff to listen and respond to the concerns and preferences of residents.

What is changing:

- Expansion of the Community Engagement Team including a digital communications officer
- The resident voice is diversifying – over 400 residents have expressed an interest in engagement opportunities
- Co-production of the service improvement programme rather than residents being engaged separate to staff

What it looks like to be a Great Landlord

- Diversity and depth of resident involvement
- Resident insight shaping decisions
- Increased trust in engagement and follow-through

2. Leadership and Culture

What this looked like:

- Frequent change in leadership and short-termism in decision-making
- Staff were sometimes hesitant about escalating problems and at times unclear about who to share them with – this delayed the escalation of some safety critical issues
- A culture of shared responsibility meant that in some areas no identifiable post holder was accountable for compliance and ensuring that the necessary actions happened
- Staff sometimes felt disempowered to resolve issues that they identified causing delays in taking (remedial) actions.

Why it happened:

- A lack of psychological safety to share some concerns, also a lack of ownership for some of the issue/s being raised
- Some staff did not feel empowered to act so decisions were not made close to the front line
- There was inconsistent performance management of staff who held posts related to compliance
- Some staff did not feel they could challenge decisions
- The operation of service was not sufficiently informed by learning from Resident feedback.

What we learned:

- We need to empower staff so that they can be confident and creative in delivering responsive and well-run services
- Staff perform at their best when they are healthy and feel psychologically safe
- Consistent leadership provides stability for long term decision making
- Performance management of staff needs to happen at all levels of the organisation and this should be informed by data related to delivery against performance targets

What is changing:

- Promotion of psychological safety
- Intention to distribute leadership and decision making through a scheme of management
- Embedding a more connected council with leadership that brings critical resources together to deliver Council Plan outcomes.

- Use of data to measure individual and team performance

What it looks like to be a Great Landlord

- Stronger frontline empowerment in risk identification
- Data informed performance management

3. Data quality and use

What this looked like:

- Incomplete records
- IT systems that cannot integrate information for individual activities related to the same buildings, i.e. information about repairs being updated in the building safety case records
- It was the norm to rely on individual or corporate memory and experience rather than data and records

Why it happened:

- Lack of consistent oversight by management regarding record-keeping
- Lack of management problem-solving creating processes (work arounds) that recognised the lack of system integration
- Legacy systems operating following the end of the Mears Partnering Contract with the service using both former Mears as well as the council's Housing ICT platforms.

What we learned:

- We could not rely on the information in our electronic records
- There were staff and contractors who did not know how to update the electronic systems
- There was inconsistent performance management to identify that records were not up to date or held inaccurate/incomplete information and ensure this was remedied

What is changing:

- The Housing service has undertaken significant investment in new Housing ICT infrastructure, including moving toward a one-system approach.
- The consistent performance in electrical compliance is a blueprint for use of data to inform planning and monitor delivery
- We are challenging colleagues that provide assurance which is not available in our electronic records

- We are using data to prioritise works and model the resources required to complete the identified works
- We are ensuring that there is governance in place to test assurance of data quality

What it looks like to be a Great Landlord

- A great landlord knows the quality of the stock they own, what works have been undertaken and when, and can use the information held to plan for preventative maintenance and longer term planned and major works programmes
- Management ensure that records are up to date
- Management ensure that the data quality in records is good

4. Prioritisation and focus

What this looked like:

- Resources were too focused on prevailing national policy, organisational priorities or emergencies rather than long-term increase in capacity to fulfil all compliance duties
- Decision-making tools were not routinely used to plan the prioritisation of works and related resources
- Some staff 'made do and mend' rather than advocate for additional resources to fulfil compliance duties
- There was an increased volume of works that led to a backlog in repairs

Why it happened:

- There was inconsistent performance management of staff who held posts related to compliance
- Staff were not always encouraged to inform planning and decisions
- The operation of service was not sufficiently informed by learning from resident and data insights.
- There was a lack of long-term focus and investment on areas not deemed to be a priority but are the bedrock of landlord services such as repairs

What we learned:

- We need to consistently monitor all areas of compliance and service delivery to identify areas that are under pressure or amassing a backlog
- We need to empower staff so that they can be confident and creative in delivering responsive and well-run services
- Leadership needs to include staff in planning to inform prioritisation

- Prioritisation should be informed by knowledge of our stock and data related to performance

What is changing:

- We are reducing the backlog in repairs, reduced by around 60% from July 2024 (and 46% from September 2024) to March 2025
- Promotion of psychological safety
- Intention to distribute leadership and decision making through a scheme of management
- Embedding a more connected council with leadership that brings critical resources together to deliver Council Plan outcomes.
- Use of data to measure individual and team performance

What it looks like to be a Great Landlord

- Stronger frontline involvement in planning
- Data-led and evidence-based prioritisation and planning

5. Workforce - Capacity and capability

What this looked like:

- Resources were too focused on prevailing national policy initiatives, organisational priorities or emergencies rather than increasing capacity or capability to fulfil all compliance duties
- Some staff became used to a 'make do and mend' culture rather than advocate for additional resources or training to fulfil compliance duties
- Specialist skills and roles were not always possible to recruit to owing to market demand, availability and council pay scales. Particularly fire safety and surveying roles.

Why it happened:

- The HRA budget had been under pressure and therefore staff had become used to spend controls and did not always ask for additional resources.
- Demand for many specialist compliance roles has increased significantly with the post Grenfell Tower legislative and regulatory requirements and the council cannot always pay the market rate.

What we learned:

- We need to empower staff so that they can be confident and creative in delivering responsive and well-run services

Leadership needs to identify skills gaps and work with HR colleagues to address these gaps.

What is changing:

- Managers are working closely with corporate services to develop a 'grow your own' plan
- Managers are working closely with HR colleagues to recruit to key compliance roles, including deploying increased staffing resources, over 20 new posts, aligned to additional £1.1m revenue investment to meet health & safety and building safety requirements.

What it looks like to be a Great Landlord

- Senior leadership understand what people resources in terms of number and competency/expertise is required to fulfil its duties
- Senior leadership have a plan for recruiting and retaining sufficient staff to fulfil its duties
- Resource planning is data-led and evidence-based

6. Managing contracts

Contract management is a cross-cutting issue. Inconsistencies in workforce capacity and capability, leadership oversight, and clarity of compliance responsibilities contributed to some failures in procurement, contract monitoring, and where appropriate enforcement. These issues did not arise independently, but rather reflect the systemic misalignments captured in the other five themes.

What this looked like:

- Compliance in some areas failed to improve despite contracts with third parties
- Lack of value for money due to sub-optimal specifications and non-enforcement of terms and conditions in relation to some contracts.
- Due to lack of capacity, contracts were often extended or rolled over rather than fully recommissioned to meet current needs and expectations
- There are over 20 contracts that have expired and require re-procurement

Why it happened:

- Successive budgets have seen a reduction in capacity for procurement support related to contracts with a total value over the length of the terms (typically 3 years) of approximately £100 million
- Lack of capacity and/or capability of some staff in relation to procurement and contract management
- Inconsistent management oversight and/or support in relation to enforcement of contracts

What we learned:

- Leadership needs to create capacity and capability for a strong client function
- We need to support staff to be confident and creative in procurements and contract management
- Senior managers need to identify skills gaps and work with Learning & Development colleagues to address these gaps

What is changing:

- We have a Member-led (cabinet advisor for Procurement and Contract Management) review of our contracting arrangements for compliance
- We are recruiting two additional staff members to focus on procurement
- Managers are working with Learning and Development to develop stronger contract management skills

What it looks like to be a Great Landlord

- Staff are confident about how to develop a procurement strategy that will ensure that contractors deliver on time and within the agreed price
- Staff are confident and feel empowered to be a strong client and take a relational and performance led approach to contract management so that they can maximise the benefits related to the contract
- Staff are robust when working with contractors that do not deliver against the specification

