

Brighton & Hove City Council

Cabinet

Agenda Item 88

Subject: Regulator of Social Housing - response to Regulatory Judgement including Procurement of Stock Conditions Contractor

Date of meeting: 11 December 2025

Report of: Cabinet Member for Housing

Lead Officer: Corporate Director Homes & Adult Social Care
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Ward(s) affected: All

Key Decision: Yes

Reason(s) Key: Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000.

For general release

1. Purpose of the report and policy context

- 1.1 This report provides a six-month update on Brighton & Hove City Council's response to the Regulator of Social Housing's (RSH) C3 Regulatory Judgement (August 2024) relating to the housing Safety and Quality Consumer Standard. It sets out the current position across key areas of compliance – fire, water, electrical, smoke detection, and repairs – and evidences the improvements delivered since the Judgement, alongside the work already underway before it.
- 1.2 The report reflects and forms part of the council's formal intensive engagement with the RSH in relation to this standard and demonstrates that the direction of travel remains positive. Strengthened leadership, clearer accountability, and better data quality have provided a stronger foundation for sustained improvement. The council is now shifting from short-term recovery towards a more mature, systems-led approach where compliance activity is routine, data-driven, and verified through governance and resident assurance.
- 1.3 In parallel, the report seeks delegated authority for the Corporate Director (Homes & Adult Social Care), in consultation with the Cabinet Member for Housing, to procure and award a two-year Stock Condition Survey Contract. This decision is a direct response to the council's Root Cause Analysis, which

identified Data Quality & Use, and Prioritisation & Focus as core drivers of improvement. The contract will enable full survey coverage of all council homes, leading to an improved understanding of the condition of the council's housing stock, and provide the robust evidence base required for long-term investment planning and regulatory assurance.

- 1.4 The report reflects the council's wider improvement journey, which began prior to the Regulatory Judgement with early actions on governance and compliance. These actions have been accelerated and consolidated through intensive engagement with the RSH, supported by the Housing Safety & Quality Assurance Board, Corporate Leadership Team (CLT) and Cabinet-led oversight. Cabinet have considered reports on Responding to the Regulator for Social Housing's Judgement in September 2024, and a Housing Safety and Quality Compliance Update in May 2025. Place Overview & Scrutiny Committee considered the Housing Regulator Judgement, Report to Cabinet in September 2024 and Housing Safety and Quality Compliance Updates in January and September 2025.
- 1.5 This report aligns with the Council Plan 2023–2027 priorities of Homes for Everyone and A Responsive Council with Well-Run Services, reaffirming the council's commitment that compliance is the floor, not the ceiling, and that every resident lives in a safe, high-quality home. Cabinet oversight remains central to maintaining transparency, accountability, and confidence in the council's continuing improvement journey.

2. Recommendations

- 2.1 That Cabinet note the progress made in improving compliance with the Regulator of Social Housing, Safety & Quality Consumer Standard since the last Cabinet update in May 2025.
- 2.2 That Cabinet delegate authority to the Corporate Director (Homes & Adult Social Care), in consultation with the Cabinet Member for Housing, to procure and award a two-year Stock Condition Survey Contract via procurement of specialist contractor, with an estimated value of £2 million, and to take all necessary steps to mobilise and manage the contract.

3. Context and background information

Progress since the Regulatory Judgement

- 3.1 On 9 August 2024, following intensive engagement, the Regulator of Social Housing issued a C3 Regulatory Judgement for Brighton & Hove City Council, identifying failings against the Safety and Quality Standard. A C3 Judgement means the Regulator found the council was failing to meet the required consumer standard for the safety and quality of homes and significant improvement was required. The Regulator highlighted weaknesses in the council's management of electrical, fire, water and smoke-detection safety, a significant repairs backlog. Since that time the council has remained in formal intensive engagement with the Regulator. The council has taken decisive

action to address each area of concern. The Regulator has confirmed that the Judgement can only be amended through a formal inspection visit that will take place within the next two years.

Table 1: progress since RSH judgement against areas identified as non-compliant.

Areas	RSH judgement August 2024	June 2024 data	Position now (Oct 2025)
Electrical safety (domestic Electrical Installation Condition Report, EICR, and communal EICRs)	Around 3,600 homes without a current EICR and no evidence of a current certificate for over 600 communal areas.	53 percent homes with a valid 5-year EICR. 20.8 percent communal areas with a valid communal EICR.	93 percent homes with valid 5-year EICR. 77.3 percent communal areas compliant.
Smoke alarms	Cannot evidence compliance with legal requirements for smoke detectors.	81.5 percent of homes had a working alarm.	99.4 percent of homes have a working alarm.
Water safety (risk assessments and remedial actions)	More than 600 buildings require a risk assessment” and “more than 500 overdue water safety remedial actions.”	52.1 percent of buildings with a valid risk assessment. (Nov 2024 - no June actions count published.)	90.4 percent of buildings with a valid assessment; 2,695 overdue actions (Sept 2025). This aligns to the significant increase in inspections.
Repairs backlog	A backlog of around 8,000 low-risk, low-priority repairs.	9,653 repairs older than 28 days.	2,479 repairs older than 28 days.
Fire safety remediation	RSH raised concerns about delays in completing over 1,700 fire safety actions identified across the stock.	4,253 FRA actions. Peaked at 8,268 in December 2024 with completion of updated FRAs on all blocks.	2,918 live FRA actions.

3.2 Over the past year the council has moved from recovery to consolidation and improvement, achieving substantial progress across all compliance areas while remaining realistic about where further work is required. The service has focused on closing the most critical safety actions, strengthening leadership and governance, improving data reliability and rebuilding confidence in the quality and safety of council homes. These improvements are being embedded into business-as-usual systems to ensure they are sustained and auditable. Residents are now experiencing clearer communication, faster

responses to safety issues and more visible safety works in their homes and blocks.

- 3.3 Governance has been strengthened through director-led oversight and the Housing Safety and Quality Assurance Board, supported by specialist appointments in fire and water safety. Delivery and financial risks (including access, contractor capacity, inflationary pressure on specialist works and temporary waking-watch costs) are monitored through the Corporate Risk Register, reported to CLT and the Cabinet Member, and reviewed through the Board each month.

Chart 1: Governance overview



- 3.4 The council continues to take a risk-based approach to ensure that we are prioritising the highest hazards first while strengthening data reliability. Mitigations include escalation under the no-access (to private dwellings) procedure, increasing contractor capacity, and monthly data-assurance checks re compliance activities. The direction of travel remains positive, with governance providing clear visibility of both progress and areas that still require improvement.
- 3.5 Sustaining improvement is now the council's central focus. Compliance performance is monitored monthly through director-led governance, with data assurance and early-warning triggers in place to prevent regression and ensure progress remains consistent across all compliance areas. Lessons from the past 18 months reflects the themes in the root cause analysis: stronger contractor management; improved data visibility through the NEC Housing system; and clearer ownership of compliance actions at every level, are being embedded into the service's continuous improvement plan.
- 3.6 These improvements mean that residents are experiencing clearer communication, faster responses to safety issues and more visible safety works in their homes and blocks. The council continues to work with residents to improve access for safety checks and to build confidence that their homes meet modern, compliant safety standards.

Progress against areas identified by the Regulator as non-complaint

- 3.7 **Fire safety** was one of the Regulator's key areas of concern, with assessments and remedial actions not previously completed in a timely way. In 2024 the total number of live fire-risk-assessment (FRA) remediation actions across the housing stock peaked at 8,228 following completion of updated fire risk assessments across all our blocks. As at October 2025, this number had reduced to 2,918, a reduction of more than 60 per cent. Within this total, the number of total high-risk actions fell from 417 in August 2025 to 14 in October 2025, and medium risk actions fell from 456 to 32 in the same time period. Each action is tracked to completion with named owners and verification checks. 2,872 low-risk actions remain, which are being managed through the council's dedicated fire-safety programme, prioritised by building risk and monitored through the fire-safety tracker.
- 3.8 L5 fire-alarm systems are being installed across eight large-panel-system blocks, including to support simultaneous evacuation and enable the removal of waking watch where in place and in agreement with East Sussex Fire and Rescue Service (ESFRS). Fire-door upgrade works are being taken forward at the Bristol Estate under compliant and closely managed oversight.
- 3.9 The council anticipates completion of the remaining fire safety actions and L5 installations by April 2026, maintaining close engagement with ESFRS to validate completion and update Fire Risk Assessments.
- 3.10 **Electrical safety** was also identified as an area of concern due to the number of overdue inspections and incomplete records. As of October 2025, 93% of our homes are within a compliant 5-year domestic testing programme, compared to just over half of all homes at the time of the Judgement. All Category 1 (C1) and Category 2 (C2) hazards identified at inspection are addressed as part of our certification. The electrical testing programme remains on trajectory to achieve full compliance by December 2026. The focus for the coming year is to sustain throughput, complete communal inspections, which have been undertaken on a risk prioritisation basis and now cover 77.3% of all communal areas, and continue improving record accuracy within the NEC system.
- 3.11 **Water safety** remains the most fragile area of compliance and continues to receive intensive director-level oversight. Performance has stabilised through weekly contractor meetings and strengthened leadership. A new Water Safety Specialist joined the council in October 2025 to improve both technical and data capacity. A comprehensive tank-remediation programme is being prepared for mobilisation from December 2025. The council recognises that it is not yet where it needs to be on water safety, and this remains a top priority. The next stage is to embed the new governance model, mobilise the remediation programme and improve contractor performance and data resilience.
- 3.12 **Smoke detection** had previously lacked consistent assurance that alarms were fitted and working in all homes. Installation and validation work has confirmed that as of October 2025, 99.4 per cent of homes have smoke detection, with 86 properties remaining, some under the no-access procedure.

Where hard wired smoke detection has not yet been fitted as part of a parallel works programme, battery powered smoke alarms have been installed to ensure compliance. The council expects to achieve full validation by December 2025 and has introduced an annual testing and reconciliation process to maintain compliance.

- 3.13 **Repairs and maintenance** were highlighted by the Regulator because of a significant backlog of overdue routine repairs. In June 2024, the total number of open repairs over 28 days stood at 9,653, reflecting historic backlogs that built up during and after the pandemic. By October 2025, this had reduced to 2,479, representing a reduction of almost three-quarters. The majority of remaining jobs are now within standard business-as-usual levels, although some older and more complex cases continue to be tracked through the backlog recovery plan. September 2025 recorded the highest inflow of new repairs since Council records began, driven by proactive damp-and-mould outreach ahead of the implementation of Awaab's Law. Overall more orders continue to be completed than the number of repairs raised each month, and workflows have been redesigned to align with statutory timescales. The service is maintaining a no-substantive-backlog position and continues to monitor completion rates and resident satisfaction to ensure sustained improvement.
- 3.14 **Data quality and oversight** has been identified as underlying weaknesses across all areas. These have been strengthened through monthly director-led meetings and the operation of the Housing Safety and Quality Assurance Board, which provides systematic oversight of compliance performance. A data-assurance routine covering source, validation and reconciliation has been embedded, and measures are in place to identify any deterioration in performance. A full Stock Condition Survey would complete the picture by providing comprehensive and validated data on the condition of all council homes within two years.
- 3.15 As a learning organisation, we are taking the learning from the different workstreams and the expertise of colleagues from across the council to sustain, further embed, and where necessary accelerate improvements in all areas of compliance. Compliance performance is monitored monthly through director-led governance, with data assurance and early-warning triggers in place to prevent regression and ensure that progress remains consistent across all compliance areas. The council has also identified common factors driving improvement across all services, including increased capacity in key regulatory and delivery roles such as fire safety, building safety and repair operatives, stronger contractor management, improved data visibility through the NEC Housing system and clearer ownership of compliance actions at every level. These lessons are being embedded as part of the service's approach to continuous improvement.

Other areas of safety and quality compliance

- 3.16 As part of our commitment to being a Great Landlord for our tenants and leaseholders we not just focused on the specific areas of compliance cited in

the Regulatory Judgement. Although not raised in the Regulator's judgement, the council continues to monitor and improve performance across all other statutory compliance areas.

- a) Housing Health and Safety Rating System (home condition): Category 1 hazards reduced from 46 in August to 17 in September through targeted interventions. Re-inspections are scheduled and non-access cases are managed under approved procedures that include welfare checks.
- b) Gas and fuel safety: All domestic and communal gas certificates are in date.
- c) Asbestos management: Rolling re-inspection programme covering common ways is continually in progress to ensure full compliance is maintained.
- d) Lift and lifting equipment safety: Servicing compliance under the Lifting Operations and Lifting Equipment Regulations is 100 per cent.
- e) Carbon monoxide detection: 99.9 per cent of dwellings have carbon monoxide detection / alarms.
- f) Leadership and culture: The council continues to promote a learning and resident-centred culture under the Great Landlord vision, ensuring staff empowerment and transparency in risk management. These improvements underpin the council's ambition to offer safe, high-quality services for all residents.

From recovery to systems-led assurance

- 3.17 The Root Cause Analysis presented to Cabinet in May 2025 identified six themes that explain the council's past compliance challenges. These were Resident Voice, Leadership and Culture, Data Quality and Use, Workforce Capacity and Capability, Prioritisation and Focus, and Responsibility for Compliance, which includes the management of contracts.
- 3.18 The council has made progress in addressing these areas and is bringing all learning together through a single Housing Delivery and Improvement Plan, to be completed by January 2026. The plan will provide one clear framework for progress and accountability, setting out actions, milestones and measures of success. It will be shaped by the feedback from residents and staff gathered through the Creating Great Homes Together consultation, regulatory consumer standards, and our vision for being a Great Landlord.
- 3.19 The Housing Delivery and Improvement Plan will include development of a Target Operating Model that is currently being developed for Housing Investment & Asset Management, and the Compliance Teams, and will sit within the council's corporate improvement framework (A Learning Council).
- 3.20 The Housing Delivery and Improvement Plan will embed a consistent approach to leadership, culture and resident engagement, ensuring that improvement is informed by the resident's voice, activities are well-resourced and improvement is sustained. This means one clear plan that brings together everything the council is doing to manage the safety and quality of homes and be responsive to the needs and preferences of tenants.

Stock Condition Survey Procurement

- 3.21 The Regulator of Social Housing's consumer standards require landlords to maintain a clear and current understanding of the condition of their homes. This is a statutory obligation under the Safety and Quality Standard. The council's root-cause analysis, undertaken as part of the response to the August 2024 judgement, identified weaknesses in the consistency of records and the integration of data systems. These limitations affected assurance about stock condition, maintenance and long-term investment planning. A report published by the Regulator in July 2025 reinforced the importance of landlords understanding their homes through comprehensive and up-to-date stock data, enabling earlier identification of hazards and more effective long-term financial planning.
- 3.22 In addition, Awaab's Law came into force on 27 October 2025. This new legislation mandates social landlords to investigate and resolve reported issues of damp, mould and other emergency hazards within strict timescales. The law will initially focus on damp and mould, with further housing hazards expected to be included and introduced during 2026. The completion of stock condition surveys will assist the council with legislative and regulatory compliance through the detection of issues and further demonstrate our commitment to proactively identifying, treating and preventing damp and mould within our tenants' homes.
- 3.23 The council's in-house stock-condition arrangements have progressed more slowly than projected when first established. Approximately 15.2 per cent of council-owned dwellings have had a survey recorded on the NEC housing system between March 2024 and October 2025. Our current resource of two in-house stock condition surveyors cannot achieve full coverage within the original five-year programme.
- 3.24 The council now intends to procure additional capacity so that all homes are surveyed within the next two years. Accelerating the programme will provide a complete and validated evidence base, strengthening compliance assurance and enabling informed investment planning. This reflects the principle that compliance is the floor, not the ceiling, and marks a shift from recovery to a proactive model of asset management.
- 3.25 Earlier and fuller data will allow the council to target investment where it most improves safety, quality and resident experience. It will support prevention of issues such as damp and mould, align building-safety works with major-works programmes and integrate retrofit and decarbonisation planning to reduce future costs. The same data will underpin the Housing Asset Management Strategy, future bids for capital investment and the Housing Revenue Account Medium Term Financial Strategy and 30-year Business Plan, supporting improved prioritisation, targeting of capital investment and value for money, including by reducing reliance on responsive repairs. The data will also inform corporate decisions on capital planning, climate commitments and financial resilience within the Housing Revenue Account. Understanding our homes in this way is fundamental to being a Great Landlord: it allows the council to

invest wisely, prevent problems and protect future generations of tenants. The programme will also place the council in a strong position to evidence compliance with the emerging review of the Decent Homes Standard and to prioritise future investment to meet new and emerging legislative and regulatory requirements.

- 3.26 Preparatory work, including a specification and data-integration protocols, has been completed to enable prompt mobilisation once Cabinet approval is secured. The estimated contract value is £2 million over two years, based on market analysis, benchmarking against the 2019 to 2020 programme and information from other social landlords that have undertaken similar work. Funding will be met from the Housing Revenue Account within the compliance and asset-management budgets approved by Cabinet for 2025 to 2026. Performance data will be overseen by the Contract Manager and reported through the Housing Safety and Quality Assurance Board, with monthly reporting on progress, budget and data quality. Mobilisation is expected to begin in spring 2026, with completion by spring 2028.
- 3.27 Procurement of a specialist contractor will be carried out to ensure quality, transparency and value. The appointed contractor will be required to complete comprehensive, high-quality stock-condition surveys across all council homes within two years, and to produce milestone summary reports showing key findings and investment requirements at agreed stages of the programme.
- 3.28 We propose to engage with residents in the procurement process, particularly considering quality elements of the contract such as customer service, resident engagement and being a considerate contractor.
- 3.29 The outcome of this procurement will be a complete, reliable and independently auditable picture of the council's housing stock. The new data will inform planned and major programmes of work and provide the foundations for the service 30 year HRA Business Plan. The council will utilise the time period over which the procured stock condition survey is undertaken to build in-house capacity and capability and ensure that future surveys can be maintained on a rolling basis without external support. For residents this will mean homes that are safer, warmer and better maintained, and clearer communication about planned works. The council will demonstrate that it knows its homes, acts on evidence and uses its resources responsibly to protect the condition of homes and plan investment for the future.

4. Analysis and consideration of alternative options

Progress against RSH concerns

- 4.1 The council continues to review and analyse progress against the areas of concern identified by the Regulator of Social Housing (RSH) in the August 2024 judgement. Formal monitoring meetings take place each month, and the Regulator has acknowledged steady improvement in the quality and

timeliness of the council's data and assurance reporting. The direction of travel remains positive. The council's focus is now on sustaining this progress, embedding consistent systems and culture, and addressing the remaining areas that require further work, particularly water safety and the integration of compliance data. Progress updates will continue to be shared with the Regulator as part of the council's formal engagement programme.

Procurement options for completing stock-condition surveys

- 4.2 A range of options have been considered to deliver this work. These are summarised below, together with an assessment of their risks and benefits.
- 4.3 **Option 1: Procure a specialist contractor (recommended option)**
This option would deliver full survey coverage within two years. It provides the capacity and specialist expertise needed to complete high-quality, accredited surveys and ensures that results are independently validated. This approach reflects best practice and responds to the Regulator's expectation that landlords understand the condition of every home they manage.
- 4.4 **Option 2: Rely on in-house surveyors**
The current in-house team of two surveyors would continue to deliver surveys under the existing rolling programme. This approach would achieve full coverage only over a period of at least five years. It would not provide the pace or independence required to assure the Regulator or support the council's investment and compliance planning. It would also increase the risk of inconsistent data quality due to limited resource and time.
- 4.5 If the procurement does not proceed, the council would not be able to complete surveys within the remaining two-year period and would continue to operate with partial and ageing stock-condition data. This would delay progress in identifying hazards or Decent Homes Standard failures and would limit the council's ability to produce an accurate long-term investment plan. It would also risk non-compliance with the Regulator of Social Housing's consumer standards and weaken the assurance framework that underpins the council's Building Safety, Fire Safety and Asset Management responsibilities. Risks associated with delivery are captured within the corporate strategic risk SR39 and monitored through the Housing Safety and Quality Assurance Board.
- 4.6 The recommended option provides the quickest and most reliable route to assist with regulatory expectations and to building the detailed asset knowledge required for long-term, value-for-money investment decisions. Financial performance of the contract will be monitored by the contract manager monthly and through the Targeted Budget Management (TBM) process and reported monthly to the Housing Safety and Quality Assurance Board.

5. Community engagement and consultation

- 5.1 The council continues to engage residents on progress since the Regulator of Social Housing's C3 judgement. Quarterly Area Panels receive updates on safety and quality, performance, and planned next steps, with questions captured and fed back into service delivery. These sessions provide a standing forum for scrutiny and for tracking progress against the themes highlighted by the Regulator.
- 5.2 Dedicated engagement continues at high-rise and Large Panel System blocks, including the Bristol Estate. Residents are informed through letters, notices, drop-ins and on-site tenancy visits. These activities support access for inspections and works, explain changes to evacuation strategies where relevant, and provide a route for individual concerns to be resolved quickly.
- 5.3 The council uses the tenant newsletter Homing In to provide regular citywide updates on safety, compliance and planned programmes. This includes plain-English explanations of what residents can expect before, during and after inspections or works, and signposts to further support.
- 5.4 Engagement feedback from Area Panels, building-specific activity at LPS and Bristol Estate, and Homing In will continue to be collated and reported through housing governance so that resident insight informs decisions and supports the council's vision of becoming a Great Landlord.
- 5.5 The Creating Great Homes Together consultation has involved residents and staff in co-designing service improvements. By the time of this report, consultation will have closed and the council will use the findings to inform priorities in the Housing Improvement Plan and to shape how services communicate and deliver at block and neighbourhood level.
- 5.6 For the stock condition survey programme, the council will follow clear resident communication protocols. Surveyors will carry identification, residents will receive advance notice of appointments, and reasonable adjustments will be offered for vulnerable households. Data will be recorded to the council's housing system and used to improve the safety, quality and upkeep of homes.
- 5.7 The survey results will provide data for our Asset Management System to inform our decisions on prioritisation of investment in planned and major capital works to our homes and continual review of our Asset Management Strategy. As this work progresses, the council will create opportunities to test and learn different ways of engaging residents on priorities and approach. This will include targeted sessions at estate and neighbourhood level, and structured feedback on how investment plans reflect what residents say will make the greatest difference to safety, quality and day-to-day living.

6. Financial implications

- 6.1 The first recommendation in this paper is for noting only. The second recommendation is seeking approval to procure external consultant services to conduct a stock condition survey covering the Council's Social Housing stock.

- 6.2 The resulting information from the survey will enable the HRA to allocate the scarce capital maintenance budgets for major works in the most effective way, based on accurate data. Although the survey will drive the capital programme, it is itself revenue in nature and will need to be funded by the HRA Revenue Budget.
- 6.3 The 30-year HRA Business Plan is currently in the process of being updated. This update will include the allocation of an annual revenue budget of approximately £1m to cover the estimated cost of the Stock Condition Survey (over 2 financial years) and will also include budgets for capital investment from which the works identified to be carried out following the Stock Condition Survey would be funded.
- 6.4 It is understood that the Housing Investment & Asset Management service does not have sufficient capacity at this time to be able to carry out the Stock Condition Survey in-house so an external consultant procured through a framework will enable the council to take advantage of economies of scale which would not be possible if the survey was undertaken internally.
- 6.6 Given this will be a multi-year contract, it is expected that inflation will be added, especially since the majority of the cost is related to staffing. The likely inflation measure has not been determined yet for this procurement exercise, but the Business Plan assumes inflation for this item of expenditure in line with RPI, so should cover any inflation that may arise through the contract negotiation.

Name of finance officer consulted: Sophie Warburton Date consulted (19/11/25)

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 continue to drive significant change. 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 East Sussex Fire & Rescue Service. The Council must comply with the enforcement notices issued by 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.
- 7.6 The report seeks to delegate authority to the Corporate Director (Homes & Adult Social Care), in consultation with the Cabinet Member, Housing, to procure and award a two-year Stock Condition Survey Contract via procurement of specialist contractor with an estimated value of £2 million. The procurement must be conducted in accordance with the relevant procurement legislation, the Council's contracts standing orders, and will be the subject of further legal and procurement advice as necessary.

Name of lawyer consulted: Natasha Watson Date consulted: 2.12.25

8. Equalities implications

- 8.1 Improving housing safety and quality has clear equality benefits. The council's compliance programmes address risks that disproportionately affect some residents, including older and disabled people, families with young children, and those living with long-term health conditions. Reducing hazards such as fire, damp and mould, cold and electrical risk supports better health and wellbeing and helps to narrow inequalities in housing outcomes.
- 8.2 Stock-condition surveys depend on residents' consent and cooperation rather than legal enforcement to gain access. Some residents may face greater barriers to engagement, including disabled people, older residents, those with language or communication needs, and people with caring or safeguarding responsibilities.
- 8.3 To ensure equality of access, the council will provide clear and accessible information, flexible appointments, translation or alternative formats where required, and respectful, trauma-informed practice by identified and DBS-checked staff. Where access continues to be a challenge, Housing compliance teams and Tenancy Services will work together to provide support and engagement, using relationship-based approaches rather than enforcement.
- 8.4 Procurement documentation will require suppliers to evidence inclusive and anti-racist practice, workforce diversity and safeguarding awareness. The contract will include the council's standard equality and anti-racism clauses, monitored through regular performance meetings.

9. Sustainability implications

- 9.1 The housing safety and quality programmes described in this report contribute positively to the council's wider sustainability objectives by improving the

condition, efficiency and lifespan of homes. The proposed stock-condition surveys will provide detailed information on the state of the housing stock, which will support future planning for energy efficiency, decarbonisation and resource use.

- 9.2 Survey activity will have some temporary environmental impact through travel, digital data storage and the use of survey equipment. These impacts will be minimised by efficient route planning, use of low-emission or electric vehicles by contractors, and digital rather than paper-based reporting. The procurement documentation will include evaluation criteria for environmental performance and social value, in line with the council's Sustainable Procurement Policy.
- 9.3 In the longer term, the survey data will enable better-targeted investment in energy performance measures such as insulation, ventilation, and low-carbon heating. It will also support the council's compliance with the Minimum Energy Efficiency Standards and delivery of its Carbon Neutral 2030 ambition. The same data will assist in managing materials more efficiently and reducing waste through planned maintenance rather than reactive works.
- 9.4 No significant negative sustainability impacts have been identified beyond the short-term operational footprint of the survey programme. These will be managed through the contract, which will include requirements for waste minimisation, responsible sourcing, and sustainable travel.

10. Health and Wellbeing Implications:

- 10.1 The council's compliance and safety programmes have a direct positive impact on residents' health and wellbeing. Safer, warmer and well-maintained homes reduce the risks of fire, damp and mould, electrical hazards and cold-related illness. They also contribute to improved mental wellbeing by providing greater security and reassurance for residents.
- 10.2 The stock-condition surveys will help the council identify hazards earlier and plan targeted investment to improve living conditions, particularly for residents most at risk of poor health outcomes, including older and disabled people, families with young children and those living with long-term conditions. Better data will also support actions to reduce fuel poverty and improve energy efficiency, supporting the city's public health and carbon reduction goals.
- 10.3 The council recognises that inspections and works can cause short-term disruption or anxiety, especially for residents with additional needs. These impacts will be mitigated through clear communication, advance notice, and flexible appointment scheduling, with support from Housing compliance and Tenancy Services teams where necessary.
- 10.4 Taken together, the compliance programmes and the proposed stock-condition survey contract will strengthen the link between housing quality and health, help to reduce health inequalities across the city and support the

council's wider objective of improving the wellbeing of residents and communities.

11. Procurement implications

- 11.1 The first recommendation in this paper is noted. The second recommendation is referred to here as it has direct procurement impact.
- 11.2 It is noted that the Housing Investment & Asset Management Service does not have sufficient capacity to deliver the Sock Condition Survey in house.
- 11.3 Therefore, the most viable process will be to externally procure support to effectively deliver this service.
- 11.4 It would be prudent to build in some contractual contingency around an potential extension should that be needed to supplement the in-house provision - a 12 month period may be sensible - this could then be enacted if required at a later date (funding allowing).

12. Crime & disorder implications:

- 12.1 Under section 17 of the Crime and Disorder Act 1998, the council must consider the potential impact of its decisions on crime and disorder and do all it reasonably can to prevent them.
- 12.2 The procurement of surveyors does not in itself present any direct crime or disorder risks. Contractors will be required to hold Disclosure and Barring Service (DBS) checks, carry identification, and follow safeguarding and lone-working procedures. These measures will ensure the safety of residents and staff during home visits.
- 12.3 There are no negative crime or disorder implications identified. The overall impact of the programmes is to enhance safety, strengthen trust between residents and the council, and contribute to the wider objective of preventing crime and antisocial behaviour in local communities.

13. Conclusion

- 13.1 The council remains in formal engagement with the Regulator of Social Housing following the C3 Regulatory Judgement issued in August 2024. The direction of travel continues to be positive, with measurable progress across all areas of safety and quality and strengthened governance now in place. An acceleration in improvement in water safety and in integrating compliance data is required; these areas will continue to receive focused attention through senior leadership oversight.
- 13.2 The next phase is to embed improvement as business as usual. This will be driven through the Housing Improvement Plan, the Target Operating Model and the outcomes of the Creating Great Homes Together consultation, creating one framework for delivery, accountability and resident engagement.

- 13.3 As part of this approach, Cabinet is asked to delegate authority to procure and award the Housing Stock Condition Survey Contract.
- 13.4 Together these actions strengthen compliance with the consumer standards, provide a sound foundation for long-term stewardship of the housing stock and demonstrate the council's continuing commitment to its Great Landlord vision: to ensure every resident lives in a safe, well-maintained and high-quality home.

Appendices

1. Housing Safety and Compliance Performance Indicators