

Wiltshire Council

Audit and Governance Committee

7 February 2024

Housing Revenue Account – Landlord Compliance Report

Executive Summary

The purpose of this report is to update the Corporate Leadership Team, Housing Board, and the Audit & Governance Committee, on the main compliance disciplines associated with the council's Landlord role in the provision of social housing. The scope covers the land and property assets in the Housing Revenue Account (HRA) managed by the Housing Management Service (HMS).

The Landlord Compliance function for the HRA has been reviewed through the autumn of 2023. This work covered all elements governing the delivery of compliance activity in the following key areas:

- Policy
- Procedures
- Performance
- Internal Assurance
- External Assurance

This report represents one of the key governance changes in ensuring that the council and the Housing Board are fully briefed on compliance activity and performance.

The service is reporting a high level of performance against the key compliance indicators. Where compliance is not 100% the service has a full and detailed understanding of why, and plans are developed to improve performance towards achieving that goal.

Proposal

The Committee is asked to note the contents of the report and progress being made.

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 - Procedures
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3. This report represents one of the key governance changes in ensuring that the council and the Housing Board are fully briefed on compliance activity and performance.
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Landlord Compliance Overview

Policy

5. The information in this report summarises the current compliance in relation to the key areas in the Landlord Compliance Policy Framework.
 - Landlord Compliance Policy – general policy that includes:
 - Exterior H&S Policy
 - Automatic Doors Policy
 - Lifts & Hoists Policy
 - Log Burner Policy
 - Radon Policy

- Solid Fuel Heating Policy
- Glazing Policy
- Fire Safety Policy – general policy that includes:
 - Fire Risk Assessment Policy
 - Carbon Monoxide Detector Policy
 - Smoke Detector Policy
 - Fire Door Policy
 - Emergency Lighting Policy
- Legionella Management Policy
- Gas Safety Inspection & Servicing Policy
- Damp & Mould Policy
- Asbestos Policy
- Electrical Systems Testing Policy

6. All of the policies within the Landlord Compliance Policy Framework are under review. There is a lack of consistency across the Policy Framework and certain areas where policies are missing. In many areas the policies exist in the form of contract specifications but not in a Policy document. All revised policies will be presented to the Housing Board over the coming months. Where appropriate, the Housing Board will be invited to contribute to the development of policy. However, the key drivers behind all compliance policies are regulation and legislation.

Procedures

7. A revised HRA Compliance Dashboard has been developed that draws together performance information relating to the compliance areas. All key areas are currently covered by the dashboard. Work is ongoing to include the lower risk areas.
8. The management of compliance activity sits within the Property Maintenance section of the Housing Management Service (HMS). Responsibility for the day-to-day management rests with the Property & Contracts Manager. Within the team, delivery is overseen through the Compliance & Servicing Officer and Health and Safety Advisor. Officers from across the wider service contribute to the monitoring and delivering of compliance activity.
9. The majority of compliance-related work is contracted to specialist providers. Policy and standards are delivered through the various contract specifications. Contractors are monitored and performance managed using contract tools and mechanisms.
10. The management and delivery of work programmes, reporting and monitoring activities are driven by the data in the housing management system.
11. Processes and procedures exist for delivering and monitoring compliance in all key areas, through contract specifications, the monitoring and management of those

contracts, and through the work of Property Maintenance Team. There are 3 key areas where improvements to procedures are immediately required:

- Electrical Installation Certificate Reports – move to full delivery within 5-year period.
- Fire Risk Assessments – improvements to recording and reporting system.
- Fire Doors – inspection and reporting system being developed for 2024.

Performance

12. Current performance across all areas is detailed under Compliance Areas below.

Internal Assurance

13. Regular meetings and reporting practices have been implemented. Monthly Compliance Meetings take place chaired and managed by the Property Maintenance Team. The Director of Assets and Head of SAM&FM & Housing Management Services are invitees. Each meeting consists of a review of all compliance policy, procedures and performance, and a monthly report is produced.

14. A 6-monthly Landlord Compliance Report is produced on and presented to CLT and the Housing Board.

15. Performance assurance is provided through the management of the suite of contracts delivered by specialist contractors. Monthly performance meetings with a set agenda are held with all providers. Performance targets are enshrined in the contract specifications. Improvements where required are delivered through contract mechanisms.

16. An audit of each compliance area has been agreed with South West Audit. 2 key areas of compliance will be audited each year over a rolling 3-year programme.

17. Further mechanisms for enhancing levels of internal assurance are being explored.

External Assurance

18. A full review of the housing data contained within the QL Housing Management System has been commissioned from a consultant provider, which will provide assurance on data quality, validate the current compliance activity and identify any data gaps.

19. Within the provisions of all compliance contracts, the Landlord has the right to appoint an independent auditor to undertake quality assurance works.

20. In respect of specialist supplier of gas safety works, the supplier is externally audited by Qualitas. This provides the contractor with a quality standard and assurance for its clients.

21. Audits in all compliance areas, and further mechanisms for enhancing levels of external assurance are being explored.

Compliance Areas – Details

22. Wiltshire Council has an obligation to comply with all landlord statutory health and safety responsibilities. The required arrangements for managing these responsibilities are in place and activities are carried out in accordance with the relevant regulations, approved codes of practice and associated HSE guidance. These provide the default position of the organisation whether internal procedures, policies and practices exist.

23. It should be noted that one of the key challenges in achieving 100% compliance is providers ability to obtain consistent access to properties. Some tenants are increasingly 'hard to reach' due to vulnerabilities and/or require significant housing tenancy interventions in order for them to agree to allow access into their property. Without access, compliance activity cannot be delivered. The 'no access' position for contractors and the housing team is always under review as is the range of tools available to the landlord including legal enforcement routes.

24. The performance information contained in the tables below was produced on 1 December 2023.

Asbestos Management

Policy, Legislation & Regulation

25. Wiltshire Council has a has a legal duty to manage asbestos containing materials within areas deemed as domestic and non-domestic, as outlined in Regulation 4 of the Control of Asbestos Regulations 2012 (CAR2012). It should be noted that any domestic property where works are to be undertaken is deemed as a workplace under the Health and Safety at Work Act 1974, and therefore will require asbestos information to be supplied as part of the pre-construction information. This is a requirement of the Construction (Design and Management) Regulations 2015 (CDM 2015).

26. The Housing Management Service (HMS) holds asbestos information on its housing stock in the form of a detailed asbestos register. Every property where asbestos is present is on the register. In addition, a library of asbestos surveys for each property is maintained. All surveys are undertaken on a cyclical 4-yearly basis. Additional surveys will also be undertaken when major refurbishments, demolition or other major construction works are required in a property when asbestos-containing materials are most likely to be disturbed. All surveys are accessible by all internal and external maintenance providers and are suitable to guide all works. All void properties have a current asbestos management survey prior to re-letting.

Procedures & Delivery

27. Asbestos management activities, surveys, re-inspections, and removals are delivered through contracts with specialist Asbestos providers. Delivery standards are monitored and maintained in accordance with these contracts.

Performance

28. The following table shows the current position for asbestos surveys undertaken.

Property Type	Number of Properties	Number Surveyed	Percentage Surveyed
Communal Areas	384	384	100%
Dwellings	5277	5273	99.92%
Garages	1235	1218	98.62%

Note – the outstanding surveys for the 4 dwellings are on a programme of work to be completed in the next period.

Electrical Safety

Policy, Legislation & Regulation

29. Electrical safety checks are delivered for all property types in the housing stock. While there is currently no legislative standard for social landlords, it is generally accepted and demanded that electrical inspections in the form of Electrical Installation Condition Report (EICR) are undertaken every 5 years. This is in line with accepted sector practice and the standards required in the Private Rented Sector. It is anticipated that this will soon become an expressed legal requirement for social landlords in the near future.
30. The provision of EICRs is through a contract. Previously the contract provision was to agree an annual programme with the provider for all EICRs reaching their 5-year anniversary in the forthcoming year. Depending on the delivery programme this meant that some inspections were carried out beyond the 5-year mark. Whilst this did not constitute a statutory breach, under the new contract HMS is improving on this approach and ensuring that all inspections are completed on or before the 5-year anniversary.
31. The 5-year target applies to all domestic dwellings and the common parts (communal areas) of flats and other grouped dwellings. All void properties receive an inspection before re-letting regardless of the age of the current EICR.
32. The target is to achieve 100% compliance. This includes undertaking remedial works against prescribed timescales:
- C1 Hazards (Danger present – risk of injury) – undertaken at the time of the inspection or if they cannot be rectified the area is made safe until works can be completed.

- C2 Hazards (Potentially dangerous) – undertaken at the time of the inspection or as soon as is practicably possible.
- C3 Hazards (improvement recommended) – undertaken within 28 days of the inspection.

Procedures & Delivery

33. Electrical inspections (EICRs) as well as all remedials and planned electrical works are delivered through a contract with a specialist provider. Delivery standards are monitored and maintained in accordance with these contracts.

34. The provider also delivers further compliance activity including Portable Appliance Testing in Sheltered Schemes (see below).

Performance

35. The following table shows the current position for electrical inspections:

Property Type	Number of Properties	Number Inspected 0-5 Years	Number Inspected 5-6 Years	Number Inspected 6-10 Years	Percentage within 0-5 Years
Dwellings	5294	4813	413	68	90.91%
Sheltered schemes	24	24			100%

36. Portable Appliance Testing (PAT) is a not mandatory by law, however testing and maintaining electrical equipment is. The Health and Safety at Work Act 1974, Electricity at Work Regulations 1989, Provision and Use of Work Equipment Regulations 1988, and the Management of Health and Safety Regulations 1999 to ensure electrical safety of portable electrical appliances. Following best practice electronics in the communal areas in sheltered schemes are tested every 12 months.

37. In addition, there are 8 assisted needs properties occupied by tenants with high care needs, where care staff regularly reside and cater for the tenants. PAT is undertaken in these 8 properties every 12 months.

Property Type	Number of Properties	Number Tested	Percentage
Dwellings	24	24	100%
Assisted needs Properties	8	7	87.5%

Note – the outstanding test on one property is on a programme of work to be completed in the next period.

Fire Safety – Fire Risk Assessment

Policy, Legislation & Regulation

38. The Chief Executive is Wiltshire Council's responsible person – as defined in Article 3 of the Regulatory Reform (Fire Safety) Order 2005 (RRFSO2005). Article 9 of the RRFSO2005 requires that the responsible person must make a suitable and sufficient assessment of the risks to which relevant persons are exposed for the purpose of identifying the measures they need to take. To satisfy this requirement, Wiltshire Council undertakes fire risk assessments to all properties deemed as non-domestic, including the communal areas of domestic buildings. Current legislation states that Fire Risk Assessments should be reviewed regularly or when circumstances change relating to the property and/or its occupants.
39. The duty to ensure that Article 9 of the RRFSO2005 is met is the responsibility of the Director of Assets. Wiltshire Council has a Fire Safety Policy and associated Procedures to ensure it manages this compliance activity in its property portfolio safely and in line with relevant legislation.
40. HMS have adopted the following timescales for fire risk assessment:
- Communal areas to all domestic blocks and sheltered schemes – Every three years with an annual review.

Note – all HRA blocks are 'low rise' (the majority of which are two storey), are mainly of traditional construction, and do not have any aluminium composite material (ACM) type cladding. Multi-occupied residential buildings of 11 metres or more are not high rise but do have a range of additional fire safety requirements. There are 3 blocks in Salisbury that are 4 storeys. Although these blocks are less than 11 metres in height, for fire safety reasons they are treated as if they were. It should also be noted that Section 156 of the Building Safety Act that came into effect 1st October is being adhered to.

Procedures & Delivery

41. FRA's are currently delivered for HMS by the council's Building Control Team. All remedial actions raised from FRA's are validated, and required works are commissioned and managed by the HMS Health & Safety Officer. Works are delivered by the in-house team and specialist contractors as appropriate. Any defects which pose immediate danger, either urgent or high priority are prioritised and within two months. The remaining actions are prioritised for completion within six months.

Performance

42. The following table shows the current position for fire risk assessments:

Property Account Type	Number of Properties	Number of Current FRAs	Percentage Compliant
Blocks and Sheltered Schemes	217	217	100%

Notes:

The number of outstanding actions changes as the recommended remedial actions from the latest FRA's are received, as these will supersede previous FRA's. As works are undertaken to resolve existing remedial actions, and potentially additional recommended remedial actions are added from new FRA's (e.g. due to changes in legislation or best practice), then this becomes, in effect, a moving target.

The data associated with FRA's and remedial works is currently received and stored outside of the main QL Housing Management System and is spreadsheet based. This means that monitoring and reporting cannot be achieved through the main QL System but instead requires manual interrogation of those spreadsheets, including manual updating when remedial works are delivered. The process and procedures for the management of this data are being re-engineered and incorporated into the QL system to enable consistent reporting and monitoring.

Fire Safety – Emergency Lighting/Fire Alarms

Policy, Legislation & Regulation

43. The requirements for the testing of emergency lighting are covered by the Regulatory Reform (Fire Safety) Order 2005, the Building Regulations 2006, The Workplace Directive and British Standard BS 5266-1.
44. Emergency Lighting is provided in all blocks, and grouped accommodations including Sheltered Schemes, a total of 217 sites. Across all sites a monthly 'flick test' of lighting and an annual drain-down battery test is delivered.
45. Fire alarms are provided in 24 of the 26 Sheltered Schemes. 2 Sheltered Schemes do not have fire alarms as they consist of separate bungalow units. Across the 24 sites a weekly test of the alarm and the whole system, including the fire heads is tested every 6 months.

Procedures & Delivery

46. Fire alarm and emergency lighting testing is delivered through a contract with specialist providers. Delivery standards are monitored and maintained in accordance with these contracts. Any remedial repairs are undertaken at the time of the inspection or at the next earliest opportunity. In respect of fire alarms, a site will not be left without a functioning alarm system.

Performance

Property Type	Inspection Type	Number of Properties	Percentage Surveyed
Sheltered Schemes	Fire Alarm: weekly test	24	100%
	Fire Alarm: 6-monthly service and test	24	100%
Sheltered Schemes & Blocks	Emergency Lighting: monthly service and test	217	100%
	Emergency Lighting: annual service and test	217	100%

Fire Safety – Smoke Alarms

Policy, Legislation & Regulation

47. The requirements covering the provision of smoke alarms are contained in the Smoke & Carbon Monoxide Alarm (England) Regulations 2015, amended in 2022. The regulations state that landlords must:

- Ensure at least one smoke alarm is equipped on each storey of the home where there is a room used as living accommodation.

48. Smoke alarms are provided as per these regulations. There is no requirement on the landlord to test smoke alarms. This is a tenant responsibility. However the HMS policy and target is to test annually.

Procedures & Delivery

49. The testing of smoke alarms is delivered through a contract with a specialist provider. The testing is carried out annually. In properties that have gas, oil, or solid fuel heating systems the annual smoke alarm test is delivered by the contractor as part of the annual safety inspection of the heating system. In properties that have electric heating the smoke alarm test is delivered by to a specific annual programme. Delivery standards are monitored and maintained in accordance with these contracts. A programme of work is underway to replace all battery smoke alarms with alarms hard-wired into the mains electricity.

Performance

Property Type	Number of Properties with Smoke Alarms	Number of properties Tested	Percentage
Dwellings	5294	4954	93.58%
Sheltered Schemes	24	24	100%

Note: 100% compliance is not expected in this area, the main reason being that if a property is due a 5-yearly EICR test in the coming year, the test of the smoke alarm will be removed from the individual programme and added to the EICR programme. This reduces the number of appointments for the tenant and reduces cost. Therefore, a small number of alarms are tested beyond the 12-month anniversary, but always within 2 years.

Fire Safety – Fire Doors

Policy, Legislation & Regulation

50. As part of the Regulatory Reform Order 2005, amended by the Fire Safety Act 2022, there is a mandatory requirement for the landlord to provide fire doors that have a 30-minute resistance (FD30 door). This requirement is for doors to individual dwellings and communal fire doors in grouped accommodations. This requirement extends to leaseholders as well as HRA tenants. It is the responsibility of the leaseholder to provide, however the HMS has a duty to enforce.

Procedures & Delivery

51. Throughout 2023 we have surveyed the asset base to identify every fire door required. Each door has been given a property ID. An App connected to the QL system has been developed to provide a tablet-based means of conducting a fire door inspection against the 5 main fire safety criteria. Over the next 12 months, the App and the inspections will be carried out and thereafter on an annual rolling programme. The inspections will be carried out by the in-house team. Where defects are identified, these will be added to existing contractor workstreams.

Performance

52. Performance will be reported as part of the next update.

Gas Safety – Annual Safety Inspection

Policy, Legislation & Regulation

53. Wiltshire Council has a duty under Regulation 36 of the Gas Safety (Installation and Use) Regulations 1988 to carry out annual safety checks on gas appliances / flues and implement an on-going maintenance regime to ensure the safe operation of gas appliances and associated pipework where gas is present.

54. Landlord Gas Safety Record (LGSR) certificates (referred to as CP12) are provided to tenants following gas safety checks.

Procedures & Delivery

55. The LGSR certificates, servicing and repairs of all gas boilers, and the LGSR certificates for gas appliances and systems, are delivered through a contract with a

specialist provider. The same provider also delivers a programme of planned boiler replacements. Delivery standards are monitored and maintained in accordance with these contracts.

Performance

56. The following table shows the current position for gas safety:

Property Type	Number of Properties with Gas	Number Inspected	Percentage Compliant
Sheltered Scheme	6	6	100%
Dwellings	3825	3823	99.95%

Note – the outstanding test on the two properties are on a programme of work to be completed in the next period.

Solid Fuel Heating Safety

Policy, Legislation & Regulation

57. A number of the dwellings are heated by various solid fuel heating systems including. The landlord requirements for these systems are contained within the Heating Equipment Testing & Approval Scheme (HETAS). HMS policy is to undertake 6-monthly service of the boiler and system, and a safety check on flues and chimneys.

Procedures & Delivery

58. The servicing and repairs of all solid fuel heating and hot water systems are delivered through a contract with a specialist provider. Delivery standards are monitored and maintained in accordance with these contracts.

Performance

59. The following table shows the current position for solid fuel safety:

Property Type	Number of Properties with Solid Fuel	Number Inspected	Percentage Compliant
Dwellings	38	36	94.74%

Note – the outstanding test on the two properties are on a programme of work to be completed in the next period

Oil-Based Heating Systems

Policy, Legislation & Regulation

60. There is no legal requirement for a landlord to obtain a safety certificate for oil fired equipment. However BS 5410: Part 1 requires oil fired appliances and equipment to be serviced periodically. HMS policy is to service boilers and appliances annually.

Procedures & Delivery

61. The servicing and repairs of all oil fired heating and hot water systems are delivered through a contract with a specialist provider. Delivery standards are monitored and maintained in accordance with these contracts.

Performance

Property Type	Number of Properties with Oil	Number Inspected	Percentage Compliant
Dwellings	235	234	99.57%
Sheltered Scheme	1	1	100%

Note – the outstanding test on the one property is on a programme of work to be completed in the next period.

Gas/Solid Fuel/Oil Heating System – Carbon Monoxide Alarm Testing

Policy, Legislation & Regulation

62. The requirements covering the provision of carbon monoxide alarms are contained in the Smoke & Carbon Monoxide Alarm (England) Regulations 2015, amended in 2022. The regulations state that landlords must:

- Ensure a carbon monoxide (CO) alarm is provided in any room used as living accommodation which contains a fixed combustion appliance (excluding gas cookers).
- Ensure that carbon monoxide alarms are repaired or replaced once informed and/or found that they are faulty.

63. CO alarms are provided as per these regulations. Combined heat detectors and CO alarms are provided in kitchens. CO alarms are provided in all properties where there is a gas, solid fuel, or oil heating appliance situated within a habitable room/living accommodation. A programme of work is underway to replace all battery alarms with alarms hard-wired into the mains electricity.

Procedures & Delivery

64. The testing of CO alarms is delivered through a contract with a specialist provider. The testing is carried out at the same time and as an integral part of as the annual gas safety inspection. Delivery standards are monitored and maintained in accordance with these contracts.

Performance

Property Account Type	Number of Properties requiring CO Alarm	Number of Co Alarm fitted.	Percentage
Dwellings	4065	4064	99.98%

Note – the outstanding test on the one property is on a programme of work to be completed in the next period.

Passenger Lifts and Stairlifts

Policy, Legislation & Regulation

65. The landlord's responsibilities are contained within the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER). This covers the servicing, inspection and maintenance of passenger lifts and stairlifts.

66. The following intervals for service and inspection apply:

- Stairlifts – annual service and inspection.
- Passenger lifts and through-floor lifts – 6 monthly service and inspection.

Procedures & Delivery

67. The servicing and inspections, and repairs and maintenance, of stairlifts, passenger lifts and through-floor lifts are delivered through contracts with specialist providers. Delivery standards are monitored and maintained in accordance with these contracts.

Performance

68. The following table shows the current position for passenger lifts and stairlifts service and inspection:

Property Type	Inspection Type	Number of Properties	Number Inspected	Percentage Compliant
Dwellings	Stairlifts: annual service and inspection	55	52	94.55%

Dwellings	Through-floor lifts: 6 monthly service and inspection	5	4	80%
Sheltered Schemes	Stairlifts: annual service and inspection	6	6	100%
Sheltered Schemes	Passenger lifts: 6 monthly service and inspection	11	11	100%

Note – the outstanding test on the three properties are on a programme of work to be completed in the next period.

Water Supply

Policy, Legislation & Regulation

69. The Control of Substances Hazardous to Health Regulations 2002 and the HSE Approved Code of Practice (L8) The Control of Legionella Bacteria in Water Systems identifies the landlord's requirement to minimise the potential of legionella growth within its stock, including communal areas. This applies to the Sheltered Schemes only. HMS policy is to provide a risk assessment for each site supported by Written Scheme For The Control of Legionella S.156 detailing our actions resulting from the risk assessment. In accordance with HSE ACoP and Guidance L8, risk assessments are reviewed following a change of use or the delivery of major works.

Procedures & Delivery

70. Weekly flushing and temperatures tests, and the annual servicing of Thermostatic Mixing Valves (TMVs) are undertaken by a specialist contractor. Delivery standards are monitored and maintained in accordance with these contracts.

Performance

71. The following table shows the current performance for Water Risk Assessments:

Property Type	Properties Requiring a Water Risk Assessment	Properties with a Water Risk Assessment	Percentage Compliant
Sheltered Schemes	23	23	100%

72. The following table shows the current performance for monthly temperature tests:

Property Type	Properties Requiring a 6 Monthly Temperature Check	Properties Tested	Percentage Compliant
Sheltered Schemes	23	23	100%

Air Source Heat Pumps

Policy, Legislation & Regulation

73. There is currently no regulation or legislation governing the servicing and inspection of Air Source Heat Pumps. HMS policy is to service ASHPs on annual basis and for further inspection of the electrical system as part of the 5-yearly EICR.

Procedures & Delivery

74. The servicing and repairs of all ASHPs is delivered through a contract with a specialist provider. Delivery standards are monitored and maintained in accordance with these contracts.

Performance

Property Type	Number of Properties	Number inspected	Percentage
Dwellings	65	63	97.01%

Note – the outstanding test on the two properties are on a programme of work to be completed in the next period.

Radon Safety

Policy, Legislation & Regulation

75. The landlord requirements for Radon safety are contained in the Ionising Radiation Regulations 2017. The Radon Action Level is the recommended limit for the activity concentration of radon in UK homes. The Radon Action Level is 200 Bq m⁻³, expressed as the annual average radon gas concentration in the home. Radon Affected Areas are those parts of the country with a 1% probability or more of present or future homes being above the Action Level. Radon UK publishes a map of the UK which shows the parts of Wiltshire that are within higher risk areas.

Procedures & Delivery

76. There are currently no HRA properties in higher risk areas that are above the Action Level threshold. Working with the Public Protection Service, this position is routinely reviewed. Should the position change and properties fall above the threshold, monitoring procedures will be implemented.

Performance

77. None to report.

Damp & Mould

Policy, Legislation & Regulation

78. The profile and focus on this issue has increased significantly over the last 18 months and the number of reported cases has rapidly increased as public awareness increases. Clear guidance has been issued by the Housing Ombudsman and Regulator of Social Housing identifying the expectations on landlords in managing damp and mould reports. Damp and mould is one of the 29 hazards assessed under the Housing Health & Safety Rating System (HHSRS), a tool used to assess risks in residential properties. As such it requires the landlord to act, or to ensure that action is taken, to manage the hazard.

Procedures & Delivery

79. HMS reviewed its policy and procedures in 2022. As well as Property Maintenance staff, all frontline staff across the service have received damp and mould training to raise awareness and to help identify potential cases. Procedures ensure that tenants are contacted and reports inspected within a target of 7 days, and action plans agreed to tackle each case are developed and communicated with each tenant.

80. All reports referencing the words 'damp' or 'mould' are initially treated as Cases regardless of severity. Once each report has been investigated actions are agreed. Minor cases can be closed once actions have been delivered and reviewed. More complex cases can take years to fully resolve. The speed and scale of actions are commensurate with the severity of each case. At the most severe end of scale, a tenant can be decanted to another property while emergency works are undertaken if it was considered that the tenant was at risk. It should be noted that this measure has not been required to date.

Performance

81. The number of open cases at any one point in time is high as the system contains every contact with a reference to damp or mould. The system does not currently differentiate and provide an assessment of severity. Nor does it provide visibility of the volume and type of works underway across the cases. This is being rectified and the system being modified so that detailed reporting on damp and mould cases can be provided.

82. The key target is to carry out inspections, and thereby understand the severity and risk of each report, within 7 days. The volume of reports over the autumn and winter have meant that this target has not been achieved, with the average being 11 days. For context, it should be noted that the proposed legal requirement on landlords will be to investigate hazards within 14 days.

83. Further indicators will be provided in the next report.

Other Considerations

84. Equality and Diversity – No particular impacts in relation to this paper.
85. Risk – As noted in this report, Wiltshire Council has an obligation to comply with landlord statutory health and safety responsibilities. All of the specific legislative requirements are outlined under the relevant activity areas in this report.
86. The property stock portfolio owned by Wiltshire Council is a substantial asset. This report outlines how risks associated with health and safety compliance for this asset base is being managed.
87. Financial Implications – Landlord health and safety property compliance funding costs are incorporated into the HRA revenue and capital budgets.
88. Value for Money (VFM) – No particular concerns in relation to this paper.
89. Resident Impact – No particular concerns in relation to this paper.

Conclusion

90. Landlord compliance is a key focus of the service. The staff and structures of the service are designed to support and deliver full compliance and high levels of assurance for tenants and their families, as well as the council and its regulatory stakeholders.
91. This report demonstrates the effectiveness of the policies and procedures and provides high levels of assurance across the key compliance areas.
92. Additionally, it allows the service to better evidence its compliance with the Regulator of Social Housing's Consumer Standards and the expectations of the Housing Ombudsman Service.

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Appendices

None

Background Papers

None