

Committee: Housing Management and Almshouses Sub-Committee	Dated: 17/04/2024
Subject: Housing Compliance Policies	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1,2,3,5,6,9,11,12
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£
What is the source of Funding?	
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Judith Finlay, Executive Director of Community & Children's Services	For Decision
Report author: Zoe Gayle, Service Improvement Manager, Department of Community and Children's Services, Housing Division	

Summary

The regulatory environment is continually evolving, with new laws, regulations, and compliance requirements emerging regularly. As a housing provider we must stay abreast of these changes and implement and adapt policies accordingly to remain compliant.

We are committed to delivering excellent and safe services for residents, employees, contractors, and other persons who may work on, occupy, visit, or use its premises. To support this, we have drafted policies covering compliance with our obligations in relation to asbestos management, water hygiene, electrical safety and lift safety.

The policies outline legal requirements and our approach to identifying, managing and/or mitigating risks in these areas.

Recommendations

Members are asked to:

- Approve the Asbestos Management Policy for use by the Housing Division
- Approve the Electrical Safety Policy for use by the Housing Division
- Approve the Lift Safety Policy for use by the Housing Division
- Approve the Water Safety Policy for use by the Housing Division

Main Report

Background

1. The City Corporation is the landlord for 1,900 social tenanted properties and over 950 leasehold properties, on twelve estates across London.
2. We are required to ensure compliance with the regulatory framework and Home Standard for social housing in England, which is monitored by the Regulator of Social Housing. The Home Standard required outcomes are:

1.1 Quality of accommodation

Registered providers shall:

- (a) ensure that tenants' homes meet the standard set out in section five of the Government's Decent Homes Guidance and continue to maintain their homes to at least this standard
- (b) meet the standards of design and quality that applied when the home was built, and were required as a condition of publicly funded financial assistance if these standards are higher than the Decent Homes Standard
- (c) in agreeing a local offer, ensure that it is set at a level not less than these standards and have regard to section six of the Government's Decent Homes Guidance.

1.2 Repairs and maintenance

Registered providers shall:

- (a) provide a cost-effective repairs and maintenance service to homes and communal areas that responds to the needs of, and offers choices to, tenants, and has the objective of completing repairs and improvements right first time
 - (b) meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes
3. Draft policies have been produced for Members' consideration which are meant to outline how we meet legal requirements and regulations, and provide a safe environment for residents, employees and visitors who live, work at, or visit our estates.
 4. The policies aim to ensure that all employees understand and adhere to the highest standards of conduct and regulatory compliance. In addition to outlining the expected standards, the policies also outline roles and responsibilities, record keeping, performance reporting and the mechanisms for reporting any concerns related to compliance issues.

Current Position

5. In response to the recommendations in the Pennington Choices report completed as part of a review of our housing management activity, the Housing Division is working to improve the services delivered to residents. There will be further

developments to promote the customer first culture and ensure there is capacity and capability to improve service delivery. Recommendations being implemented include, but are not limited to:

- Review of all policy documents and introduction of new approaches and changes
 - Review and development of Key performance indicator (KPI) measures for all services
 - Review of job roles and descriptions, and clarification of ownership and accountability in key areas
 - Introduction of a Housing Compliance Manager role
6. The regulatory environment is continually evolving, with new laws, regulations, and compliance requirements emerging regularly. As a housing provider we must stay abreast of these changes, implement and adapt policies accordingly to remain compliant. Work has been carried out to identify key services and ensure they're covered by policies and any policy gaps. To ensure an excellent service and ongoing compliance, amongst others, the following policies were identified as being required:
- Asbestos Management
 - Electrical Safety
 - Lift Safety
 - Water Hygiene
7. The Housing Division employs external contractors to carry out most compliance related activities. These include routine inspections and maintenance and recording and reporting of data. Employees and external contractors are to adhere to legal guidelines and procedures. The implementation of the policies clarifies the clear and responsible approach we take to ensure homes and communal areas are safe.
8. Property Services, within the Housing Division, is undertaking recruitment with some roles being responsible for compliance related activity. The policies will provide clear accountability of duties and responsibilities to ensure a smooth transition of duties and promote ongoing compliance to ensure the safety of residents, employees and other service users.
9. Key performance indicators (KPIs) have been established and are maintained to ensure we are able to report on performance in relation to compliance safety. KPI measures are produced and provided to Senior Management monthly and will be included in the Committee reporting cycle to ensure Members are aware of performance.
10. The Housing Division follows a systematic approach to the management of compliance related activities to ensure it meets the requirements set out by legislation and regulations, these policies outlines procedure that are already in practice.

11. Draft policies have been shared with colleagues and the Housing User Board (HUB), our virtual consultation mechanism. Residents have engaged and provided feedback which has been acknowledged and reflected in the policies where appropriate (please see Appendix 5).

Options

12. The risk of not implementing such policies is a lack of clarity of roles and responsibilities leading to ineffective monitoring, maintenance and reporting therefore presenting the possibility of being non-compliant. The consequence of non-compliance can result in:

- Legal sanctions: non-compliance with regulations can lead to legal sanctions, including fines, penalties, legal action, and regulatory enforcement actions. These can have significant financial implications and damage our reputation.
- Reputational damage: instances of non-compliance can tarnish an organisation's reputation, eroding trust among stakeholders and undermining its value. Rebuilding trust and credibility after reputational damage can be a lengthy and arduous process.
- Financial losses: non-compliance can result in financial losses stemming from fines, legal fees and remediation costs. These losses can have a detrimental impact on the organisation's bottom line and long-term viability.
- Operational disruptions: regulatory non-compliance can disrupt business operations, leading to delays, interruptions, and inefficiencies. This can impede productivity and damage relationships with our customers and suppliers.

13. On approval, the policies will be made readily accessible to all employees through SharePoint and uploaded to the public website for residents and service users ensuring easy reference whenever needed. All contractors performing compliance related activities will also be issued a copy of the relevant policy.

14. These policies will also be used to support procurement processes, for instance the one due to take place for the HRA responsive repairs contract beginning in 2025.

Proposals

15. It is therefore proposed that the policies are approved to:

- provide an overview of the legal and regulatory framework governing social housing identifying relevant laws, regulations, and standards that must be adhered to by the City Corporation and relevant contractors
- outline the roles and responsibilities, establishing mechanisms for co-ordination, communication, compliance and escalation
- help navigate any complexities and ensure consistent compliance throughout the supply chain

- establish the standards for the maintenance of social housing properties to ensure they are safe, habitable, and sustainable over the long term, including provisions for regular inspections, maintenance schedules, contingency plans and response procedures for emergencies
- describe the mechanisms for monitoring compliance with policies, including regular audits, inspections, and reporting requirements.

Corporate & Strategic Implications

Strategic implications – This proposal aligns with key objectives in the Corporate Plan for 2024-29 where there is a commitment to ensure people receive good services, live in good quality homes, and can live independent and healthy lives.

Financial implications

None

Resource implications

None

Legal implications

None

Risk implications

None

Equalities implications

None

Climate implications

None

Security implications

None

Conclusion

16. These policies demonstrate our commitment to upholding the highest standards of compliance and accountability in the performance and administration of safety related activity. By implementing and adhering to these policies, we aim to achieve our mission of providing excellent and safe housing and services for residents, employees, contractors, and other persons who may work on, occupy, visit, or use our premises.

17. These policies will not only mitigate the risk of legal and reputational harm but also foster a culture of integrity and accountability within the Housing Division.

Appendices

- Appendix 1 - Asbestos Management Policy
- Appendix 2 - Electrical Safety Policy

- Appendix 3 - Lift Safety Policy
- Appendix 4 - Water Safety Policy
- Appendix 5 – Consultation responses

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