



**SHDC Housing Revenue Account  
Governance Framework  
Housing Landlord Services  
November 2024**

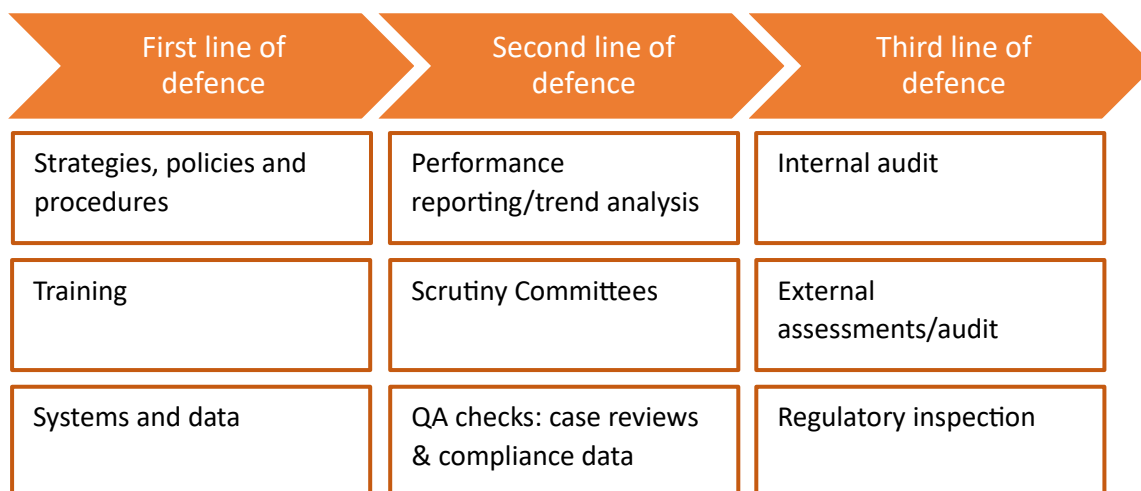
## Contents

<b>1. Introduction</b>	<b>3</b>
<b>2. Regulation of the Council as a registered provider</b>	<b>3</b>
<b>3. Oversight of the Housing Revenue Account</b>	<b>4</b>
<b>4. Roles and responsibilities</b>	<b>6</b>
<b>5. Directors' remuneration and management costs</b>	<b>9</b>
<b>6. Responsible Persons</b>	<b>9</b>
<b>7. Housing Revenue Account</b>	<b>10</b>
<b>8. Risk management</b>	<b>11</b>
<b>9. Monitoring compliance and performance</b>	<b>13</b>
<b>10. Data returns submitted to the Regulator of Social Housing</b>	<b>14</b>
<b>11. Tenant satisfaction</b>	<b>14</b>
<b>12. Complaint Handling</b>	<b>16</b>
<b>13. Assurance</b>	<b>18</b>
<b>14. Business continuity</b>	<b>19</b>
<b>15. Procurement and value for money</b>	<b>19</b>
<b>16. Monitoring compliance with the Consumer Standards</b>	<b>20</b>
Appendix A - Data submitted Corporate Governance Clinic (Senior Leadership Team, Performance Monitoring Panel and Cabinet)	22
Appendix B – Summary of monitoring arrangements	24
Appendix C –Responsible Persons: Roles, Responsibilities and Assurance Arrangements	26

## 1. Introduction

This document sets out the governance arrangements for the Housing Landlord Service. This document will be reviewed annually. Significant operational or policy events could also trigger a review of the document.

The Framework mitigates the risks associated with non-compliance in delivering the outcomes of the Regulator of Social Housing's regulatory standards using a three lines of defence model, set out in the diagram below.



We recognise that additional steps are necessary to allow tenants the opportunity to scrutinise and influence our governance arrangements and management of risk and performance. Enhanced arrangements will be co-produced with tenants during 2024/25, and steps have begun already as part of our reengineering tenant engagement project including a tenant survey and focus groups scheduled for Autumn 2024.

## 2. Regulation of the Council as a registered provider

### Regulator of Social Housing

The Regulator of Social Housing sets 'consumer' and 'economic' regulatory standards for registered providers of social housing.

For local authorities, the economic standard relates to the setting of rent (the rent standard). From April 2024, registered providers are subject to proactive regulation against the consumer standards. The Regulator completes programmed inspections at least every four years against these standards and publishes a summary of their findings, known as a Regulatory Judgement.

The Regulator of Social Housing adopts a co-regulatory approach, holding Councillors responsible for ensuring that the Council, in its role as a registered provider of social housing, is delivering the outcomes of consumer standards. We support and embrace this in a variety of ways including:

- Portfolio Holder for Strategic and Operational Housing chairing multiple Housing Clinics and the Housing Transformation Board.
- Providing a formal update on delivery of the outcomes of the consumer standards to Cabinet on a quarterly basis.

- Involving Scrutiny at all opportunities, both formally and informally.
- Holding regular Member informal briefings and providing regular updates in the Member e-briefing.

#### Housing Ombudsman Service

The Regulator of Social Housing and the Housing Ombudsman Service have arrangements in place for the two bodies to work together. The Ombudsman can formally refer a matter to the Regulator where their investigation into an individual case, or cases, indicates that there may be a wider systemic failing and there may be evidence of a breach of the regulator's standards.

#### Building Safety Regulator

The Building Safety Regulator is part of Health and Safety Executive and was established under The Building Safety Act 2022. Their role is to oversee the safety and performance of all buildings, as well as having a special focus on high-rise buildings. They promote competence and organisational capability within the sector including for building control professionals and tradespeople.

### 3. Oversight of the Housing Revenue Account

#### South & East Lincolnshire Councils Partnership

Since forming in October 2021, the South & East Lincolnshire Councils Partnership has been focused on delivering quality services, opportunities, investment and value for our residents, businesses, partners, and employees.

The Partnership is the largest of its kind in the country, with around 1,000 members of staff and 122 elected members serving over 300,000 residents across 1,112 square miles in total.

South Holland District Council is the sole registered provider with more than 1000 homes within the South & East Lincolnshire Councils Partnership.

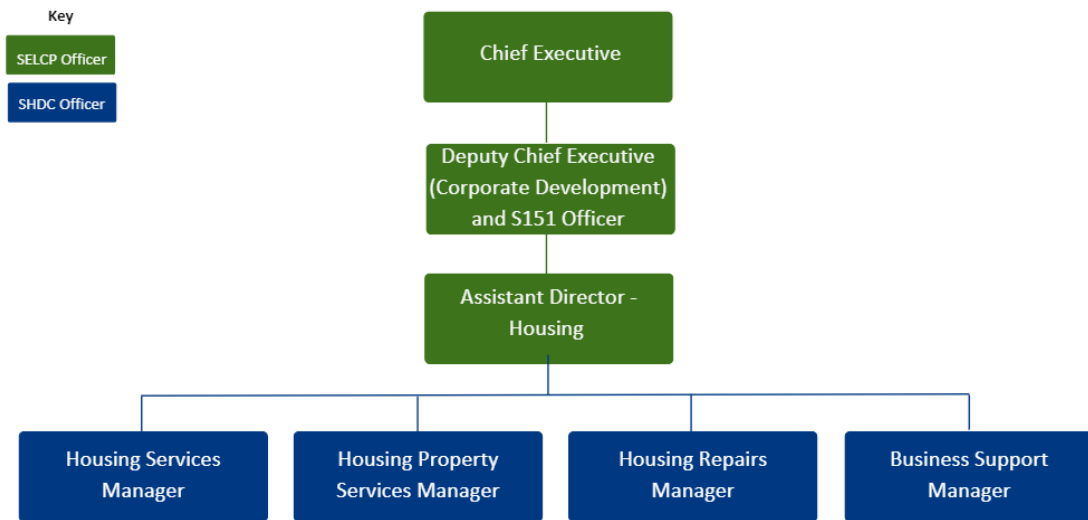
#### South Holland District Council's constitution

Updated in January 2024, the Council's constitution sets out how the Council operates, how decisions are made and the procedures which are followed to ensure that these are efficient, transparent and accountable to local people.

The constitution sets out the basic rules governing the Council's business. A copy of the constitution is available at

<https://democracy.sholland.gov.uk/ieListMeetings.aspx?CommitteId=365&info=1&bcr=1>

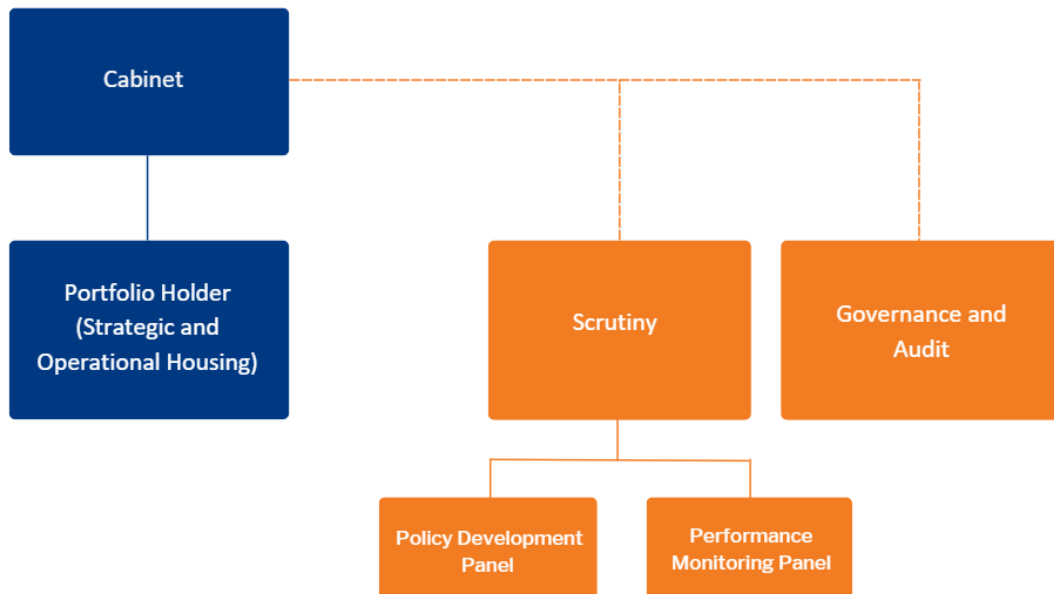
## Management and Senior Officer structure



The Sheltered Housing Project Manager and HRA Transformation Programme Manager also form part of the Management Structure as temporary posts focussed on delivering a Sheltered Housing review and preparing the organisation for proactive regulation.

In July 2024, a temporary arrangement was established whereby the Housing Repairs Manager is acting-up as the role of Housing Repairs and Property Services Manager. This arrangement was determined in response to the Housing Property Services post becoming vacant coupled with the pending review of the service (as part of the wider Housing Transformation and Service Improvement Programme). The arrangements are being monitored by the Assistant Director – Housing.

## Councillor oversight and scrutiny across the Housing Landlord Service



## Tenant oversight and scrutiny

The Council intends to establish a way to give tenants a wide range of meaningful opportunities to influence and scrutinise our performance and services as a landlord during

2024/25. To commence this work, a tenant survey was conducted during July and August 2024, focused on how tenants would like to be involved in shaping our services. Over 200 responses were received with tenants accepting invitations to attend a variety of focus groups organised for early Autumn 2024.

Performance, compliance and satisfaction data is published on our website at [www.sholland.gov.uk/myhome](http://www.sholland.gov.uk/myhome) and is included in our annual report to tenants. This report includes reference to service improvements proposed in response to the data.

## 4. Roles and responsibilities

### Officers

#### Joint Chief Executive

The main link between Councillors and Officers across South Holland District Council, East Lindsey District Council and Boston District Council, promoting positive and open communications and ensuring strategic priorities are implemented in an appropriate and accountable manner.

#### Deputy Chief Executive (Corporate Development) and s151 Officer

Responsible for Corporate Development, Governance and Member Services at South Holland District Council, East Lindsey District Council and Boston District Council, and sole responsibility for South Holland District Council's Housing Revenue Account. As s151, responsibilities also include the provision of strategic financial planning, financial accounting, financial advice and accountability for financial affairs.

#### Assistant Director- Governance and Monitoring Officer

Responsible for risk management, Democratic Services, Legal Services, data protection complaints, Governance General, Deputy Monitoring Officers, elections, Freedom of Information, investigations, and Corporate Support. As the Monitoring Officer, responsibilities also include matters relating to the conduct of councillors and officers and the operation of the Council's constitution.

#### Assistant Director – Housing

Responsible for providing effective leadership for, and management of, Housing Landlord Services to ensure services are, within the resources available, of the highest quality and meet Member and public aspirations, whilst achieving value for money. Responsible Person for the Council's overall compliance with the Regulator of Social Housing's Consumer Standards.

#### Housing Services Manager

Responsible for tenancy management, estate management, rent collection, tenancy enforcement, allocation and letting of housing and tenancy support.

#### Housing Property Services Manager

Responsible for programmed improvements and compliance. Health and Safety Lead, responsible for compliance with landlord health and safety on behalf of the Council. Accountable Person for Higher-Risk Residential Buildings (as defined by the Building Safety Act 2022). This post is vacant currently and the Housing Repairs Manager is currently acting up to cover this role in addition to their responsibilities as Housing Repairs Manager. This

situation is under review pending a wider Service review as part of the Housing Transformation and Service Improvement Programme.

#### Housing Repairs Manager

Responsible for the responsive repairs and void property repairs. In July 2024, a temporary arrangement was established whereby the Housing Repairs Manager is acting-up as the role of Housing Repairs and Property Services Manager. This arrangement was determined in response to the Housing Property Services post becoming vacant coupled with the pending review of the service (as part of the wider Housing Transformation and Service Improvement Programme). The arrangements are being monitored by the Assistant Director – Housing.

#### Business Support Manager

Responsible for delivering technical and administrative support to the service including management of the Housing software system. Lead Officer for Housing Complaints and Lead Officer for compliance with the Rent Standard, whilst the annual decision to review rents is reserved for Full Council.

### Members

#### Full Council

The Full Council is responsible for the Budget and Policy Framework of the Council and for all of the functions not the responsibility of the Cabinet. It will carry out some functions itself, but others will be delegated to Committees or Officers.

On an annual basis, Full Council determines the annual Housing rent review and HRA budgets including the Capital Programme.

#### Cabinet

The Cabinet is appointed to carry out all of the Council's functions which are not the responsibility of any other part of the Council, whether by Law or under this Constitution. Many decisions will be made by the Cabinet, rather than the full Council.

Housing policies and strategies and performance information is presented to Cabinet for determination.

#### Portfolio Holder- Strategic and Operational Housing

Member Responsible for Complaints (MRC), ensuring that complaint handling drives service improvement for residents and learning and business improvement for the Council.

Cabinet Member with delegated authority from the Leader to make decisions on the following Housing Landlord Service-related items:

- ASB and Community Safety
- Housing Landlord
- HRA Property Management
- Sheltered Housing
- Lifelines
- Void Repairs
- HRA Sewerage Works
- Housing Complaints
- Right to Buy Admin
- Council House Re-buy Admin
- Rent Collection
- Upgrades
- Allocations
- Rent Income Subsidies
- Responsive Repairs
- HRA Housing Development Programme

### Performance Monitoring Panel

As per the Council's Constitution, the purpose of the Panel is to review and scrutinise the performance of the Council in relation to its policy objectives, performance targets and/or particular service areas – this will be assisted by officers submitting quarterly Performance Indicator reports to the Panel.

Performance information will be reported to the Panel for scrutiny on a quarterly basis. See section 9 for more information.

### Policy Development Panel

As per the Council's Constitution, the purpose of the Panel is to assist the Council and the Cabinet in the development of its Budget and Policy Framework by in-depth analysis of policy issues.

All Housing policies will be reviewed by the Panel prior to being recommended to Cabinet for adoption.

### Governance and Audit Committee

As per the Council's Constitution, the purpose of the Committee is to monitor governance, risk and internal control arrangements at the Council, to provide independent assurance that these are effective and efficient.

Audit reports and strategic risks are presented to the Committee. See sections 8 and 13 for more information.

## Housing Landlord Services Working Groups

### Housing Landlord Services Compliance Clinic

Chaired by Portfolio Holder - Strategic and Operational Housing this Clinic is formed of the Deputy Chief Executive (Corporate Development), Assistant Director – Housing and Housing Managers. The Clinic is held to review the compliance and performance of the service, focussed on compliance with health and safety requirements of a landlord and compliance with the Consumer standards.

### Housing Landlord Services Governance Clinic

Chaired by Portfolio Holder - Strategic and Operational Housing this Clinic is formed of the Deputy Chief Executive (Corporate Development), Assistant Director – Housing and Housing Managers. The Clinic is held to monitor governance, risk management and internal control arrangements of the service.

### Housing Landlord Services Complaints Working Group

Chaired by the Lead Officer for Housing Complaints, this Working Group identifies themes and trends of complaints and drives service improvement in response to them, making recommendations to the Housing Governance Clinic and Member Responsible for Complaints. The Group also supports compliance with the Housing Ombudsman Complaint Handling code.

### Housing Landlord Services Board

Chaired by Assistant Director – Housing and attended by Housing Managers, the purpose of this Board is to ensure collective awareness and visibility relating to regulatory assurance, financial resilience, risk management, performance and compliance on all matters relating to



being an effective and compliant landlord. The Board will also hold a space to share ideas, discuss challenges impacting the delivery of the service and inform strategic decisions.

#### HRA Housing Transformation and Improvement Board

Chaired by Portfolio Holder - Strategic and Operational Housing the Board has a key role in supporting the Housing Transformation Team in making decisions and delivering the Housing Transformation and Service Improvement Programme approved by Cabinet on 13<sup>th</sup> February 2024. The role of the advisory Board is not to make decisions but to provide current knowledge, critical thinking and analysis to increase the confidence of the decision maker. The Board is made up of the following Officers: Deputy Chief Executive (Corporate Development) (Programme Sponsor), HRA Transformation Team, Assistant Director – Housing (Vice Chair), Head of Customer Contact (PSPS Ltd), Assistant Director – Corporate, Assistant Director – Wellbeing and Community Leadership, Head of Delivery, Assistant Director – Regulatory and Assistant Director – Governance and Monitoring Officer. A Critical Friend has also been appointed to the Board, providing honest and impartial feedback, challenging the programme and focus of the Transformation Board.

Appendix B summarises the monitoring arrangements in place.

## 5. Directors’ remuneration and management costs

The Transparency, Influence and Accountability Standard, requires all registered providers to provide tenants with accessible information about their Directors’ remuneration and management costs.

#### The remuneration payable to the highest paid Director, relative to the size of the landlord

Remuneration for senior officers is published online at [www.sholland.gov.uk/about-your-landlord](http://www.sholland.gov.uk/about-your-landlord) The Council is seeking guidance from the Regulator on how to calculate the costs as per their ‘Directors remuneration and management costs’ note.

#### The aggregate amount of remuneration paid to Directors, relative to the size of the landlord

Remuneration for senior officers is published online at [www.sholland.gov.uk/about-your-landlord](http://www.sholland.gov.uk/about-your-landlord) The Council is seeking guidance from the Regulator on how to calculate the costs as per their ‘Director’s remuneration and management costs’ note.

#### Management costs, relative to the size of the landlord

Management costs per unit is calculated as per the Regulator of Social Housing’s ‘Director’s remuneration and management costs’ note. This information is published on our website at <https://www.sholland.gov.uk/about-your-landlord> Information on how we spend rental income is included in the annual report to tenants.

## 6. Responsible Persons

As per the Consumer Standards, registered providers must make information available to tenants about the relevant roles and responsibilities of senior officers, including who has responsibility for compliance with the consumer standards.

Further information on the arrangements in place providing assurance to these individuals is set out in appendix C.

### Person responsible for compliance with the Consumer Standards

The Assistant Director – Housing is responsible for the Council’s overall compliance with the Regulator of Social Housing’s Consumer Standards. The Deputy Chief Executive (Corporate Development) and s151 Officer acts a strategic critical friend to the Person responsible for compliance with the Consumer Standards.

### Lead Officer for Health and Safety

The Housing Property Services Manager is responsible for the Council’s compliance with Health and Safety requirements in its role as a social landlord. The Assistant Director-Housing acts as a strategic critical friend to the Lead Officer for Health and Safety issues.

### Responsible Person for compliance with Fire Safety

The statutory role of Responsible Person is considered to be held by the Chief Executive of South Holland District Council. Whilst the Chief Executive has overall and final responsibility for fire safety, duties and actions associated to fire safety within the Housing Landlord Service are delegated to Assistant Director - Housing, supported by the Housing Property Services Manager.

### Accountable Person for compliance for Higher-Risk Residential Buildings

The Assistant Director – Housing is responsible for the Council’s compliance with high-rise residential buildings (as defined by the Building Safety Act 2022).

### Lead Officer for Housing Complaints

The Housing Business Support Manager is the nominated lead officer for Housing Complaints.

### Member Responsible for Complaints (MRC)

The Portfolio Holder - Strategic and Operational Housing is the Member Responsible for Complaints, responsible for ensuring that complaint handling drives service improvement for tenants, and tenants and learning and service improvement for the Council.

### Lead Officer for compliance with the Rent Standard

The Housing Business Support Manager is the nominated lead officer for compliance with the Rent Standard.

## 7. Housing Revenue Account

### HRA Business plan

The HRA Business Plan financial model combines both the capital and revenue projections for the HRA. It is reviewed annually and evidences that we have financially sustainable plans in place, and the resources to deliver them.

A review of the HRA Business Plan model including associated stress testing will be completed during 2024/25. This work will involve providing a viable and deliverable model, detailed Business Plan narrative including recommendations for evidence led strategic decisions and a HRA Capacity review, including reviewing the existing and potential borrowing capacity.

### Budget management

Budgets are set and approved by full Council on an annual basis with forecast quarterly outturn reports provided throughout the year. The HRA has a dedicated accountant within the PSPS Finance Team who meets with Budget Managers on a monthly basis. Meeting outcome records and are shared with senior Finance colleagues and the s151 Officer. Updates on budget variances are discussed at the Housing Landlord Board on a six weekly basis and reported to the Portfolio Holder - Strategic and Operational Housing on a quarterly basis (at the Housing Governance Clinic). Where variances exist, Managers explain steps being taken to address them and whether any more frequent updates to the Board/Clinic are necessary.

### Annual Financial Statement

At the end of each financial year the Council produces a financial statement in accordance with the requirements of the CIPFA/LASAAC 'Code of Practice on Local Authority Accounting in the United Kingdom' published by the Chartered Institute of Public Finance and Accountancy. The Annual Financial Report gives a clear, objective, and balanced assessment of the Council's performance in the last financial year (including the HRA) and includes major influences on the Council's finances for the year in question and the future.

The Statement also encompasses the Council's annual governance statement setting out the Council's approach to corporate governance and how it manages its governance arrangements in accordance with the Code of Governance. This statement explains how the Council has complied with the Code and also meets the requirements of the Accounts and Audit Regulations 2015 in relation to consideration of the findings of a review of the system of internal control and approval and publication of an annual governance statement.

## 8. Risk management

The Council's Risk Management Framework set out the principles followed for implementing effective risk management, provides an overview of the anticipated benefits in taking this approach to risk management and sets out the Council's attitude to risk.

### Recording risk

An operational risk register records all risks for the Housing Landlord Service including any risks linked to Housing Projects. Risks are assigned to the relevant service manager and reviewed on a monthly basis. The Assistant Director - Housing owns the risk register and reviews the register quarterly.

The key risks recorded on the register have been scrutinised externally by Lincoln City Council, in their capacity as a registered provider. The Council works with a range of Councils on a number of matters to ensure that differing views ensure the Council delivers the most effective service to its tenants.

Strategic risks are recorded on the Corporate Risk Register. Further information is available in the Housing Landlord Services Risk Register procedure.

## Reporting and scrutinising risk management



### Housing Landlord Services Governance Clinic

A copy of the risk register is presented, highlighting risks and key changes, to the Portfolio Holder - Strategic and Operational Housing and Deputy Chief Executive (Corporate Development) on a quarterly basis.

### Corporate Governance Clinic

The Assistant Director – Housing presents strategic risks and key changes to the Corporate Governance Clinic on a quarterly basis.

### Senior Leadership Team

The Assistant Director - Governance & Monitoring Officer presents a report on strategic risks and key changes to Senior Leadership Team on a quarterly basis (as part of a corporate update).

### Governance and Audit

The Business Intelligence and Change Manager provides a quarterly update on risk management and key changes at Governance and Audit (as part of the corporate update).

### Tenants

The Council intends to establish a way to give tenants a wide range of meaningful opportunities to influence and scrutinise our performance and services as a landlord during 2024/25. To commence this work, a tenant survey was conducted during July and August 2024, focused on how tenants would like to be involved in shaping our services. Over 250 responses were received with tenants accepting invitations to attend a variety of focus groups organised for early Autumn 2024.

Data around risk management is published on our website at [www.sholland.gov.uk/myhome](http://www.sholland.gov.uk/myhome) and is included in our annual report to tenants. This report includes reference to service improvements proposed in response to the data.

## 9. Monitoring compliance and performance

The South & East Lincolnshire Councils Partnership's Performance Management Framework sets out monitoring and reporting arrangements regarding strategic ambition measures and corporate and local priorities for the Partnership.

### Recording compliance and performance

Data on compliance and performance (including complaint handling) is collated on a monthly basis for consideration by Housing Service Managers. The Business Support Manager is responsible for collating the data on behalf of the service. Relevant managers have been assigned specific risks to manage data to monitor and report on.

### Benchmarking

Targets have been set based on good practice and comparable registered providers. Tenant Satisfaction Measure management data will be benchmarked against the data for all large registered providers (anticipated to be published by the Regulator during Autumn 2024).

### Reporting and scrutinising compliance and performance



#### Housing Landlord Services Compliance Clinic

Compliance and performance data is presented to the Portfolio Holder – Strategic and Operational Housing and Deputy Chief Executive (Corporate Development) on a monthly basis. This report includes reference to learnings and service improvements proposed in response to the data.

#### Corporate Governance Clinic

The Assistant Director – Housing presents data on compliance and performance to the Corporate Governance Clinic on a quarterly basis.

#### Senior Leadership Team

The Assistant Director – Corporate presents a report on compliance and performance to Senior Leadership Team on a quarterly basis (as part of a corporate update) - see appendix A for information on the KPIs reported.

#### Performance Monitoring Panel and Cabinet

The Business Intelligence and Change Manager provides a quarterly update on compliance and performance at Performance Monitoring Panel (as part of the corporate update), followed by Cabinet. See appendix A for information on the KPIs reported.

## Tenants

The Council intends to establish a way to give tenants a wide range of meaningful opportunities to influence and scrutinise our performance and services as a landlord during 2024/25. To commence this work, a tenant survey was conducted during July and August 2024, focused on how tenants would like to be involved in shaping our services. Over 250 responses were received with tenants accepting invitations to attend a variety of focus groups organised for early Autumn 2024.

Performance data is published on our website at [www.sholland.gov.uk/myhome](http://www.sholland.gov.uk/myhome) and is included in our annual report to tenants. This report includes reference to learnings and service improvements proposed in response to the data.

## 10. Data returns submitted to the Regulator of Social Housing

The Regulator of Social Housing collects data from registered providers of social housing in order to inform its operational approach to regulating its standards.

The Business Support Manager is responsible for ensuring the following submissions are returned on an annual basis:

- Tenant Satisfaction Measures – details on tenant satisfaction and compliance
- Local Authority Data Return – details on stock and rents.

## 11. Tenant satisfaction

### Recording tenant satisfaction

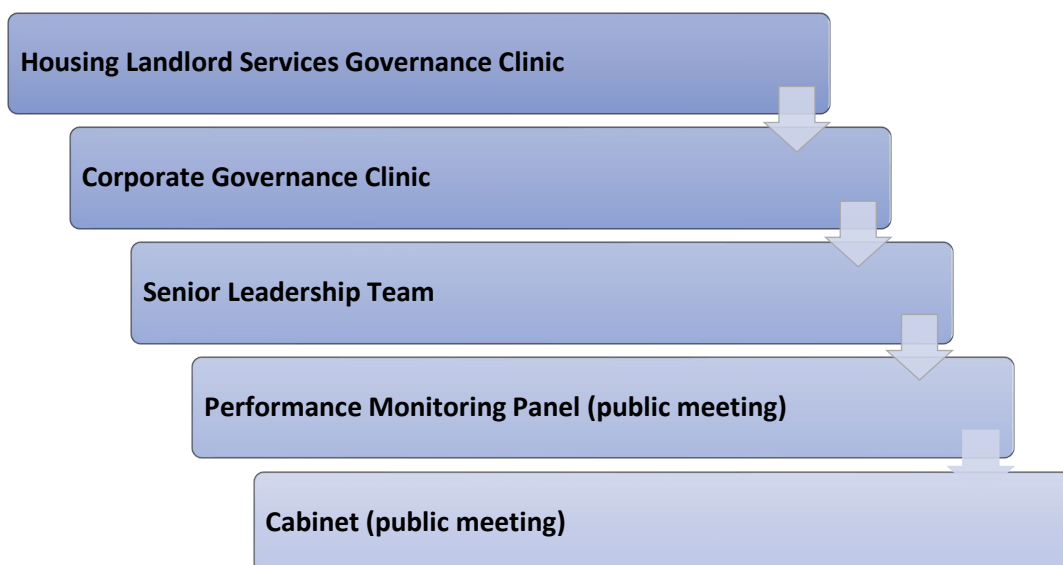
Tenant Satisfaction Measures are the Regulator of Social Housing's standards on assessing landlords regarding the provision of good quality homes and services. Tenant Satisfaction surveys are carried out on an annual basis by a third party on behalf of the Council. The Council intends to establish ways to collate additional data on tenant satisfaction during 2024/25.

The methodology for collating the data and questions asked is determined by the Regulator of Social Housing. Further information is available at [https://assets.publishing.service.gov.uk/media/64357b33cc99800013b8936a/TSM\\_Technical\\_requirements.pdf](https://assets.publishing.service.gov.uk/media/64357b33cc99800013b8936a/TSM_Technical_requirements.pdf). The Business Support Manager is responsible for collating the data on behalf of the service.

### Benchmarking

Data is currently collated on questions set by the Regulator as part of the Tenant Satisfaction Measure Perception survey. The Council will benchmark its data against the data for all large registered providers (anticipated to be published by the Regulator during Autumn 2024).

## Reporting tenant satisfaction



### Housing Landlord Services Governance Clinic

Satisfaction data is currently presented to the Portfolio Holder – Strategic and Operational Housing and Deputy Chief Executive (Corporate Development) on an annual basis. This report includes reference to service improvements proposed in response to the data.

### Corporate Governance Clinic

The Assistant Director – Housing presents data on tenant satisfaction to the Corporate Governance Clinic on an annual basis. This report includes reference to service improvements proposed in response to the data.

### Senior Leadership Team

The Assistant Director – Corporate presents a report on tenant satisfaction to Senior Leadership Team (as part of a corporate update). This report includes reference to service improvements proposed in response to the data.

### Performance Monitoring Panel and Cabinet

The Assistant Director-Housing provides an annual update on tenant satisfaction at Performance Monitoring Panel followed by Cabinet. This report includes reference to service improvements proposed in response to the data.

### Tenants

The Council intends to establish a way to give tenants a wide range of meaningful opportunities to influence and scrutinise our performance and services as a landlord during 2024/25. To commence this work, a tenant survey was conducted during July and August 2024, focused on how tenants would like to be involved in shaping our services. Over 250 responses were received with tenants accepting invitations to attend a variety of focus groups organised for early Autumn 2024.

Tenant satisfaction data is published on our website at [www.sholland.gov.uk/myhome](http://www.sholland.gov.uk/myhome) and is included in our annual report to tenants. This report includes reference to service improvements proposed in response to the data.

## 12. Complaint Handling

The Housing Landlord Service is statutorily required to meet the requirements of the Housing Ombudsman Complaint Handling Code. A copy of the Council's Housing Compliments, Complaints, Comments and Compensation policy is available at [www.sholland.gov.uk/Housing-policies](http://www.sholland.gov.uk/Housing-policies).

The Business Support Manager is responsible for publishing the Council's annual self-assessment against the Code and is the lead officer for complaints.

### Recording complaint handling and performance

All complaints are logged including the time taken to respond, the outcome of the complaint including, along with learnings and compensation awarded.

Data on complaint handling is collated on a monthly basis and considered by Service Managers, Senior Officers and the Portfolio Holder - Strategic and Operational Housing at the Monthly Compliance Clinic. Information, themes, and learnings from complaints are presented at Housing Governance Clinic, with attendees including the Portfolio Holder - Strategic and Operational Housing, along with quarterly updates provided to Performance Monitoring Panel and Cabinet. The Business Support Manager and Lead Officer for Complaints is responsible for collating the data on behalf of the service.

### Benchmarking

Data is submitted to the Regulator of Housing (as part of the Tenant Satisfaction Measures) on volumes of complaints received and timescales for handling complaints. This data will be benchmarked against the data for all large registered providers (anticipated to be published by the Regulator during Autumn 2024).

An annual self-assessment is published and submitted to the Housing Ombudsman on compliance with the Complaint Handling Code.

### Reporting and scrutinising compliance and performance

#### Data on complaints:

Statistics on items including number of responses within the Complaint Handling Code timescales and the volume of complaints received are reported at the Housing Landlord Services Compliance Clinic (as part of a Tenant Satisfaction Measure report). See section 9 for more information.

#### Information on complaints including themes and learnings:

The Housing Landlord Services Complaints Working Group is an officer working group established to carry out continuous and learning improvement by assessing themes or trends to identify potential systematic system issues, serious risks, or policies and procedures that require revision. Key themes and learnings are reported at the Housing Landlord Services Governance Clinic (including the Member Responsible for Complaints) on a quarterly basis, and Cabinet on a six-monthly basis. Reports include reviews of issues and trends arising from complaint handling along with service improvements made in response to complaints (as per the Housing Ombudsman Service's Complaint Handling Code).





Housing Landlord Services Complaints Working Group

The Housing Landlord Services Complaints Working Group reviews the complaints received, considers learnings and makes recommendations for any additional service improvements required. This meeting is held six weekly and chaired by the Lead Officer for Complaints.

Housing Landlord Services Board

Chaired by Assistant Director – Housing and attended by Housing Managers, the purpose of this Board is to ensure collective awareness and visibility relating to regulatory assurance, financial resilience, risk management, performance and compliance on all matters relating to being an effective and compliant landlord. Learnings from complaints and service improvements are reported at this Board for further discussion and implementation.

Housing Landlord Services Governance Clinic

Information around complaint themes, trends, service improvements and compensation awarded is presented to the Portfolio Holder – Strategic and Operational Housing (Member Responsible for Complaints) and Deputy Chief Executive (Corporate Development) on a quarterly basis. Reports will evidence that the tenants voice is being heard and listened to, with improvements made in response to this.

Cabinet

The Lead Officer for Complaints presents data and information on complaints on a six-monthly basis, setting out trends and learnings along with improvements made in response to tenant feedback. Reports are taken annually to Cabinet to review and scrutinise the findings of the self-assessment against the Complaint Handling Code along with the annual complaints performance and service improvement report.

Tenants

The Council intends to establish a way to give tenants a wide range of meaningful opportunities to influence and scrutinise our performance and services as a landlord during 2024/25. To commence this work, a tenant survey was conducted during July and August 2024, focused on how tenants would like to be involved in shaping our services. Over 250 responses were received with tenants accepting invitations to attend a variety of focus groups organised for early Autumn 2024.

Performance data is published on our website at [www.sholland.gov.uk/myhome](http://www.sholland.gov.uk/myhome) and is included in our annual report to tenants. This report includes reference to service complaint themes, learnings and improvements completed in response to complaints.

### Ombudsman investigations

Tenants have a right to escalate cases to the Housing Ombudsman as per the Housing Ombudsman Complaint Handling Code. The Lead Officer for Complaints will case manage the investigation, keeping the Assistant Director-Housing and Member Responsible for Complaints informed. In addition, the Lead Officer will also inform Senior Leadership Team and the Monitoring Officer of any determination outcomes including Complaint Handling Failure Orders. The Monitoring Officer will brief Cabinet on any Complaint Handling Failure Orders and progress made in complying with the Order.

## 13. Assurance

### Audit

The Council is responsible for establishing and maintaining appropriate risk management processes, control systems, accounting records and governance arrangements. Internal audit plays a vital role in advising the District Council that these arrangements are in place and operating effectively.

Assurance mapping is completed by the Assistant Director - Housing on an annual basis with internal audit (Assurance Lincolnshire). This exercise highlights critical activities, key projects and partnerships, risks and emerging risks.

The following internal audits have recently been completed:

- Housing rents, June 2023 (Financial control)
- Housing Compliance, September 2023 (Internal control)
- Housing (Allocations) and Homelessness, 2022
- Pooling of Housing Receipts (Right to Buy) submission (annual audit).

Audit progress reports are presented to the quarterly Housing Governance Clinic (including the Deputy Chief Executive (Corporate Governance) and s151 Officer and Portfolio Holder - Strategic and Operational Housing), and Governance and Audit on a regular basis, in addition to annual reports. The Assistant Director – Housing has oversight of the audit actions.

The Council's annual statement of accounts (including the HRA) is subject to an external audit prior to publishing. The accounts and audit are presented to Governance and Audit Committee each year, and a copy is published at [www.sholland.gov.uk/article/5578/Financial-Statements](http://www.sholland.gov.uk/article/5578/Financial-Statements) .

### Annual rent reviews

Rent reviews are set by the Regulator of Social Housing each year as part of the rent standard. A data return is submitted annually to the Regulator (known as the Local Authority Data Return, LADR) based on the rent model. This data is validated by the Regulator of Social Housing.

### LGA Corporate Peer Challenge

The Council welcomes reviews from Peers including the LGA by way of a Corporate Peer Challenge. Bringing together political and managerial leadership, through the use of Member

and Officer peers, a peer challenge provides robust, strategic and credible challenge and support to councils. Most recent Peer Challenges include:

- LGA Social Housing Management Peer Challenge 2022
- LGA Corporate Peer Challenge 2023.

### Health & Safety Audit

Public Sector Partnership Services Ltd audit the Housing Department on a three yearly basis to measure the effectiveness of the Health & Safety management system and gather evidence (view records, ask questions, etc) to assess working practice against existing policies, procedures and legislative requirements. Required actions will be captured by the Health and Safety team and followed up as appropriate to ensure completion. Findings are reported to the Assistant Director – Housing and the Strategic Health and Safety Board (chaired by the Assistant Director – Regulation and Corporate Lead Officer for Health and Safety).

## 14. Business continuity

The Housing Landlord Service has the following Business Impact Analysis documents established recording arrangements to continue to deliver the service in an emergency or business continuity incident:

- Housing Property Services – owned by the Housing Property Services Manager
- Housing Repairs – owned by the Housing Repairs Manager
- Housing and Support Services – owned by the Housing Services Manager.

These documents are reviewed annually with the Lincolnshire County Council Emergency Planning & Business Continuity Service and the data from this analysis feeds into each service area's Business Continuity Plan.

## 15. Procurement and value for money

The Council complies with Public Contracts Regulations 2015, as well as its own Contract Procedure Rules. PSPS Ltd's Contracts and Procurements Service provides professional expertise to the HRA around procurement. A copy of the Procurement Strategy for 2023-2026 is available on our website [www.sholland.gov.uk/article/7949/Our-Approach-to-Procurement](http://www.sholland.gov.uk/article/7949/Our-Approach-to-Procurement)

Value for money and open competition through open tendering is the preferred option for the majority of HRA contracts, including Sewage Treatment Maintenance, Heating Upgrades etc. Where an alternative procurement option is sought, such as further competition or direct award through a framework, value for money is satisfied via benchmarking rates.

The Assistance – Director Housing has delegated authority to publish an Officer decision awarding a contract. Decisions are published at [www.sholland.gov.uk/article/5276/Committees-and-decisions](http://www.sholland.gov.uk/article/5276/Committees-and-decisions)

All expenditure over £500 is published at [www.sholland.gov.uk/article/7087/Payments-to-suppliers](http://www.sholland.gov.uk/article/7087/Payments-to-suppliers) . The contracts register for all contracts exceeding £5,000 is published at [www.sholland.gov.uk/article/24540/Contracts-Register](http://www.sholland.gov.uk/article/24540/Contracts-Register)

## 16. Monitoring compliance with the Consumer Standards

The organisation has completed the following pieces of work to assess the Council against delivery of the outcomes of the Consumer Standards:

- LGA Social Housing Management Peer Challenge 2022 – assessing the Council against the charter for social housing residents (White Paper). (The LGA will review progress as part of their SHDC Peer Review in June 2024).
- Consumer Regulation Health Check 2023 - assessing the Council against the draft Consumer Standards.

In 2023, the Council established a Housing Transformation and Service Improvement Programme to deliver recommendations made as part of these assessments.

### Housing Transformation and Service Improvement Programme

In 2023, Cabinet adopted a Housing Landlord Strategy and Housing Transformation Programme. These documents set out the steps required to deliver the outcomes of the Consumer Standards (including recommendations from the LGA Social Housing Management Peer Challenge 2022 and the Consumer Regulation Health Check 2023). The Housing Transformation Team has been established to focus on delivering recommendations of the programme.

Discussions around the progress of the programme are held with the Portfolio Holder - Strategic and Operational Housing and Assistant Director-Housing on a weekly basis. Progress of the programme is formally monitored by the Housing Transformation and Service Improvement Board, with meetings held quarterly. The role of the advisory board is not to make decisions but to provide current knowledge, critical thinking and analysis to increase the confidence of the decision maker. Updates on the progress of the programme are provided to Senior Leadership Team (quarterly) and Cabinet (six monthly).

### Oversight from the Person Responsible for Compliance with the Consumer Standards

The Person Responsible for Compliance with the Consumer Standards is subject to regular updates on the Housing Landlord Service's compliance with the Consumer Standards in the following ways:

- Individual reporting arrangements with Housing Managers as part of informal discussions and one to ones.
- Housing Landlord Services Board with the agenda scoped around the outcomes of the consumer standards (Chair)
- Housing Landlord Services Compliance Clinic (Deputy Chair)
- Housing Landlord Services Governance Clinic (Deputy Chair)
- Housing Transformation and Service Improvement Programme (Deputy Chair).

A procedure has been produced to support the Responsible Person for Compliance with Consumer Standards in determining whether it is necessary to self-refer to the Regulator. This procedure includes notifying the Portfolio Holder - Strategic and Operational Housing and Deputy Chief Executive (Corporate Development) and s151 Officer of incidents, including scenarios where the Responsible Person for Compliance with Consumer Standards has

reviewed an incident and determined that it was not necessary to refer to the Regulator. (All incidents are logged including the findings, outcome of internal referral and learnings).

## Appendix A- Data submitted Corporate Governance Clinic (Senior Leadership Team, Performance Monitoring Panel and Cabinet)

*Unless otherwise stated, the data is reported as a snapshot on the last working day of the quarter.*

Tenant Satisfaction Measure (Management Information) *	Responsible Officer	2024/25 Target
<b>Keeping properties in good repair</b>		
RP01: Proportion of homes that do not meet the Decent Homes Standard. (%)	Housing Property Services Manager	2%
RP02(1): Proportion of non-emergency responsive repairs completed within the landlord's target timescale - 28 days. (%)	Housing Repairs Manager	90%
RP02(2): Proportion of emergency responsive repairs completed within the landlord's target timescale** (%)	Housing Repairs Manager	100%
<b>Safety checks</b>		
BS01: Proportion of homes for which all required gas safety checks have been carried out. (%)	Housing Property Services Manager	100%
BS02: Proportion of homes for which all required fire risk assessments have been carried out. (%)	Housing Property Services Manager	100%
BS03: Proportion of homes for which all required asbestos management surveys or re-inspections have been carried out. (%)	Housing Property Services Manager	100%
BS04: Proportion of homes for which all required legionella risk assessments have been carried out. (%)	Housing Property Services Manager	100%
BS05: Proportion of homes for which all required communal passenger lift safety checks have been carried out. (%)	Housing Property Services Manager	100%
<b>Effective handling of complaints</b>		
CH01(1): Number of stage one complaints received per 1,000 homes.	Business Support Manager	Data only
CH01(2): Number of stage two complaints received per 1,000 homes.	Business Support Manager	Data only
CH02(1): Proportion of stage one complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales. (%)	Business Support Manager	95%
CH02(2): Proportion of stage two complaints responded to within the Housing Ombudsman's Complaint Handling Code timescales. (%)	Business Support Manager	95%
<b>Responsible neighbourhood management</b>		
NM01(1): Number of anti-social behaviour cases opened per 1,000 homes.	Housing Services Manager	Data only
NMO1(2): Number of anti-social behaviour cases that involve hate incidents opened per 1,000 homes.	Housing Services Manager	Data only
<b>Internal performance measures</b>		
Number of damp, condensation and mould cases reported in the last quarter.	Housing Property Services Manager	Data only
Proportion of homes for which an Electrical Installation Condition Report (EICR) has been carried out (%)	Housing Property Services Manager	100%

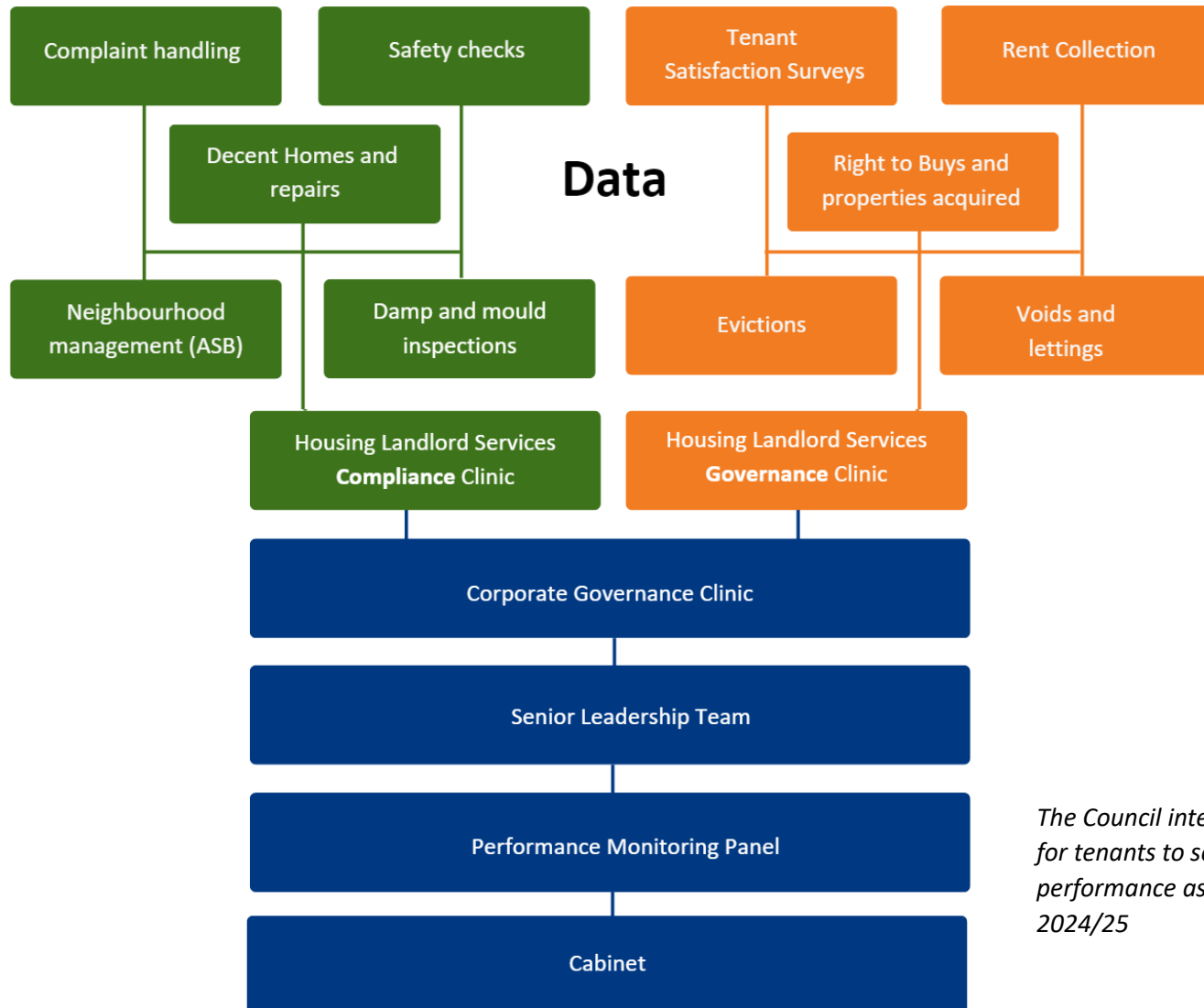
Gross rent arrears (including service charges) as a percentage of rent due for the reporting year. Note the following tenures are reported by exception on request: supported accommodation, garages, temporary accommodation and shared ownership.	Housing Services Manager	4%
Average time to re-let a property excluding major works in the last quarter***	Housing Repairs Manager	28 days
Number of households evicted in the last quarter	Housing Services Manager	N/A
Number of Right to Buy sales completed in the last quarter	Business Support Manager	N/A
Number of new properties completed in the last quarter	Business Support Manager	N/A
<b>Tenant Satisfaction Measure (Perception Information) *</b>		
Tenant satisfaction survey data - reported annually	Business Support Manager	N/A

\* Tenant Satisfaction Measures - The Regulator of Social Housing's standards on assessing landlords regarding the provision of good quality homes and services. Further information is available at [https://assets.publishing.service.gov.uk/media/64357b33cc99800013b8936a/TSM\\_Technical\\_requirements.pdf](https://assets.publishing.service.gov.uk/media/64357b33cc99800013b8936a/TSM_Technical_requirements.pdf)

\*\* Current SHDC timescales are 8 hours during office hours and 4 hours outside of office hours.

\*\*\*Major works – void property requiring replacement of major components such as kitchen, bathroom, windows, heating system and/or where the property has been handed over to insurers in response to an emergency incident e.g. fire.

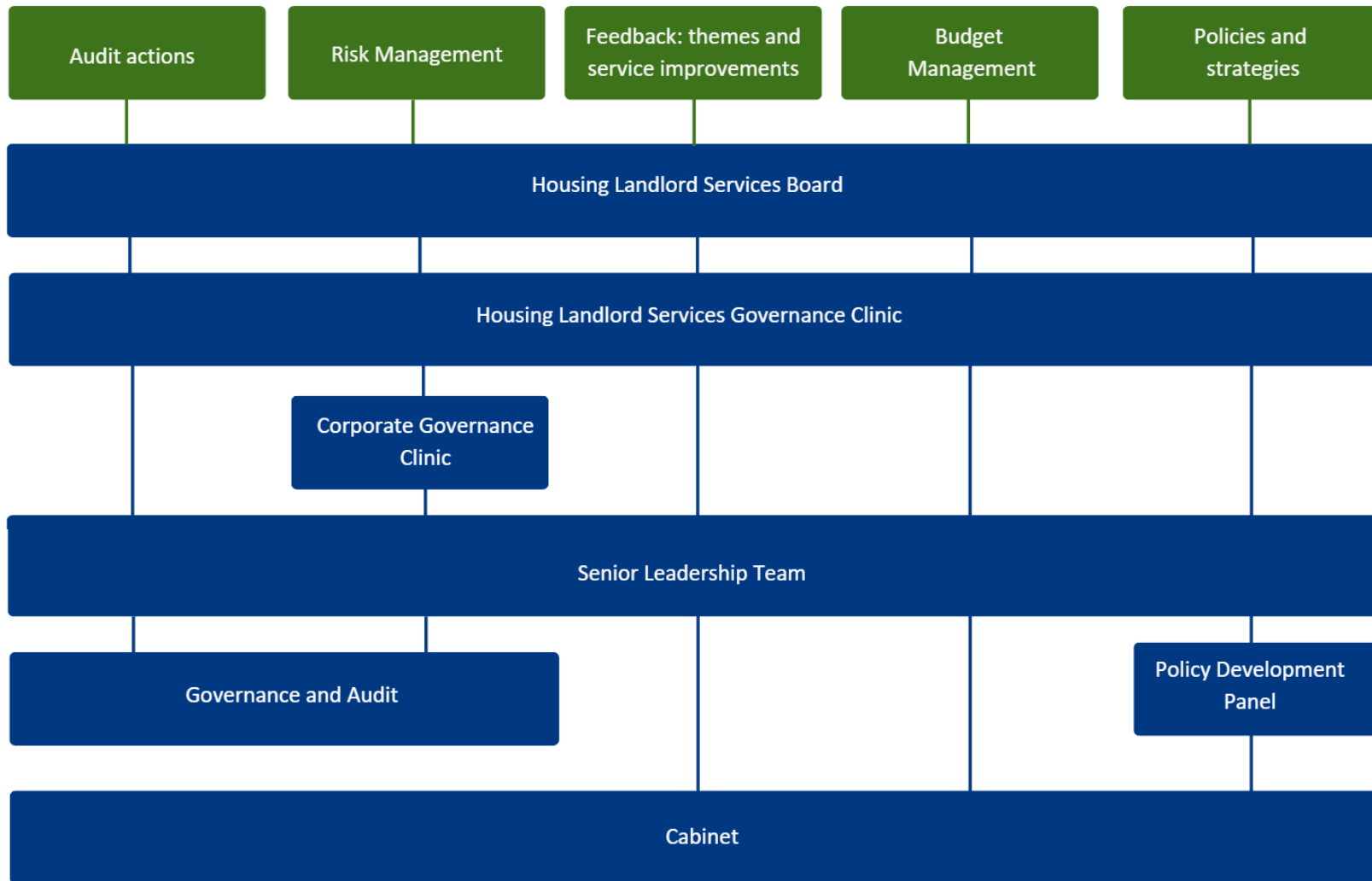
Appendix B – Summary of monitoring arrangements



*The Council intends to establish ways for tenants to scrutinise our performance as a landlord during 2024/25*



# Information



*The Council intends to establish ways for tenants to scrutinise our performance as a landlord during 2024/25*



# **SHDC Housing Landlord Services Responsible Persons: Roles, Responsibilities and Assurance Arrangements**

**September 2024**

## Background

This document summarises the roles, responsibilities and assurance arrangements in place for the following:

- Person Responsible for Compliance with the Consumer Standards
- Lead Officer for Health and Safety requirements
- Person responsible for Fire Safety (landlord)
- Accountable Person for Higher-Risk Residential Buildings
- Member Responsible for Complaints (MRC)
- Lead Officer for Housing complaints.

Individuals were appointed to these roles by way of a Portfolio Holder decision effective from 23 May 2024. These roles are recorded in the Log of Delegations to Officers, managed by Democratic Services.

Individuals and the arrangements in place will be reviewed on an annual basis by the Assistant Director – Housing. This document will be updated annually to reflect any changes, or sooner if there is a change in legislation.

## Person responsible for Compliance with the Consumer Standards

Individual appointed for 2024/25

Assistant Director – Housing

### Summary of role and responsibilities

The regulator requires registered providers to tell it at the earliest opportunity about any material issues that relate to non-compliance or potential non-compliance with the standards. Being open and transparent with the regulator is an essential part of registered providers meeting their co-regulatory responsibilities.

Transparency, Influence and Accountability Standard (Consumer Standards)

*2.3.5 Registered providers must make information available to tenants about the relevant roles and responsibilities of senior level employees or officers, including who has responsibility for compliance with the consumer standards.*

*2.6.1 Registered providers must communicate in a timely manner with the regulator on all material issues that relate to non-compliance or potential non-compliance with the consumer standards.*

S194C 2008 Housing and Regeneration Act (amended by Social Housing (Regulation) Act 2023)

*194C Standards relating to information and transparency:*

*(1 ) The regulator may set standards for registered providers in matters relating to the provision of information to their tenants of social housing and to the regulator, including standards requiring information to be published.*

*(2) Standards under subsection (1) may, in particular, require registered providers to comply with specified rules about—*

*(a) the provision of information to their tenants of social housing concerning the accommodation, facilities or services provided in connection with social housing, including information concerning—*

*(i) their tenants' rights in connection with those things, and*

*(ii) how to make complaints against registered providers,*

*(b) monitoring their compliance with standards under this section and sections 193, 194 and 194A\* and informing the regulator if they have failed, or there is a risk they will fail, to meet any of those standards, and*

*(c) the publication of information about—*

*(i) the remuneration of their executives, and*

*(ii) their income, management costs and other expenditure.*

*(3) For the purposes of subsection (2)(c), an "executive", in relation to a registered provider, means an individual who is both—*

*(a) an officer or employee of the registered provider, and*

*(b) responsible for the management of the provider."*

*\*Sections 193, 194 and 194A:*

*S193 - Standards relating to consumer matters*

*The regulator may set standards for registered providers as to the nature, extent, safety, energy efficiency and quality of accommodation, facilities or services provided by them in connection with social housing.*

*S194 - Standards relating to economic matters (Does not apply to SHDC)*

*The regulator may set standards for private registered providers in matters relating to their financial and other affairs.*

*S194A - Standards relating to competence and conduct*

*The regulator may set standards for registered providers in matters relating to the competence and conduct of individuals involved in the provision of services in connection with the management of social housing ("relevant individuals").*

#### [Arrangements in place to provide assurance to this individual and the organisation](#)

The Person Responsible for Compliance with the Consumer Standards is subject to regular updates on the Housing Landlord Service's compliance with the Consumer Standards in the following ways:

- Individual reporting arrangements with Housing Managers as part of informal discussions and one to ones.

- Housing Landlord Services Board with the agenda scoped around the outcomes of the consumer standards (Chair)
- Housing Landlord Services Compliance Clinic (Deputy Chair)
- Housing Landlord Services Governance Clinic (Deputy Chair)
- Housing Transformation and Service Improvement Programme (Deputy Chair).

A procedure has been produced to support the Responsible Person for Compliance with Consumer Standards in determining whether it is necessary to self-refer to the Regulator. This procedure includes notifying the Portfolio Holder - Strategic and Operational Housing and Deputy Chief Executive of incidents, including scenarios where the Responsible Person for Compliance with Consumer Standards has reviewed an incident and determined that it was not necessary to refer to the Regulator. (All incidents are logged including the findings, outcome of internal referral and learnings).

### Arrangements for tenants to raise concerns with the Person responsible for Compliance with the Consumer Standards

Enquiries can be sent to [housing.regulation@sholland.gov.uk](mailto:housing.regulation@sholland.gov.uk) or by phoning 01775 761161. This information has been shared with tenants in the following ways:

- Housing annual report 2023/24, published July 2024
- our website at <https://www.sholland.gov.uk/about-your-landlord>
- included in sign-up packs for new tenants
- included in mutual exchange paperwork
- published in Sheltered Housing community centres and flat schemes.

## Lead Officer for Health and Safety requirements

### Individual appointed for 2024/25

Housing Property Services Manager, with responsibilities delegated to the Housing Repairs Manager whilst the post is vacant. (The Regulator was notified of this individual on 23/05/2024 via NROSH submission).

### Summary of role and responsibilities

The Housing and Regeneration Act 2008 (as amended) requires registered providers to nominate a designated person for health and safety issues. All registered providers are required to notify the Regulator of the name and contact details of its designated health and safety lead, and publish that information.

Housing and Regeneration Act 2008, part 126A-C

#### *126B Functions of the health and safety lead*

*(1) The functions of the health and safety lead for a registered provider are to—*

- (a) monitor the provider's compliance with health and safety requirements;*
- (b) assess risks of failure to comply with health and safety requirements;*
- (c) notify the responsible body of the provider of—*

*(i)risks assessed under paragraph (b) of material failures by the provider to comply with health and safety requirements;*

*(ii)material failures by the provider to comply with health and safety requirements;*

*(d)provide advice to the responsible body as to how the provider should address risks and failures notified to the responsible body under paragraph (c) for the purpose of ensuring that the provider complies with health and safety requirements.*

#### *126C Duties of registered provider in relation to health and safety lead*

*(1)A registered provider must—*

*(a)ensure that the health and safety lead—*

*(i)has sufficient authority (including, in particular, authority to obtain information) within the provider’s organisation, and*

*(ii)can devote sufficient time to the functions of the health and safety lead, to perform the role of health and safety lead effectively;*

*(b)provide the health and safety lead with the resources needed to carry out those functions.*

*(2)A registered provider must, in accordance with requirements published by the regulator—*

*(a)notify the regulator of the name and contact details of the health and safety lead, and*

*(b)publish that information.*

*Nothing in sections 126A to 126C affects—*

*(a)the responsibility of a registered provider for compliance with health and safety requirements, or*

*(b)the liability of the registered provider or of any director, member or other officer or person for a failure to comply with health and safety requirements.*

*The health and safety lead is not, by virtue of those sections—*

*(a)responsible for the registered provider’s compliance with health and safety requirements, or*

*(b)liable for a failure by the registered provider to comply with health and safety requirements,*

*(but this does not affect any responsibility or liability which the individual designated under section 126A has otherwise than as health and safety lead).*

*(3)A registered provider may nominate an individual to carry out the functions of the health and safety lead if the health and safety lead is unable to act due to absence or illness.*

The Council will ensure that properties are repaired and maintained in accordance with best practice and legislation, including the following:

- Social Housing Regulator Economic and consumer standards
- Homes (Fitness for Human Habitation) Act 2018 (HFHHA 2018)
- Housing Acts 1985,1988,1996,1998 and 2004
- The Secure Tenants of Local Authorities (Right to Repair) Regulations SI. 1994 No 133
- The Secure Tenants of Local Authorities (Compensation for Improvements) regulations 1994, SI 1994 No 613
- The Leasehold Reform, Housing and Development Act 1993
- Landlord and Tenant Act 1985
- Defective Premises Act 1972
- Landlord and Tenant Act 1985 - Section 11
- Defective Premises Act 1972 - Section 4
- Environmental Protection Act 1990- Part III
- Gas Safety (Installation and Use) Regulations 1998
- Commonhold and Leasehold Reform Act 2002
- Equalities Act 2010
- Control of Asbestos Regulations 2012
- Housing Health & Safety Rating System
- Health and Safety at Work Act 1974
- Provision and Use of Work Equipment Regulations.

Inspection and remedial compliance information is held and managed within the Housing intranet, and relevant contractor portals.

The Assistant Director-Housing has overall responsibility for the Health and Safety of properties managed by the Housing Landlord Service, supported by the management team and Statutory Compliance Co-ordinator.

The Lead Officer for Health and Safety is responsible for implementation and management of practical aspects of statutory maintenance in properties owned and managed by Council, including the competence of all persons involved. Also, to establish and maintain direct lines of communication with the various Housing stakeholders; specialist contractors and consultants, ensuring an efficient two-way exchange of information and records.

Statutory compliance service contractors provide practical advice on management and the control of the risks of statutory maintenance; undertake risk assessments, surveys and reports; carry out monitoring, maintenance and testing, inspection and audits, as required.

Key stakeholders and partners include the Council's internal auditors, the Regulator of Social Housing and competent bodies, such as Gas Safe.

#### [Arrangements in place to provide assurance to this individual and the organisation](#)

The Lead Officer for Health and Safety is subject to regular updates on the Housing Landlord Service's compliance with health and safety in the following ways:

- Housing Landlord Services Board with the agenda including health and safety compliance and incidents.
- Housing Landlord Services Compliance Clinic – reviewing the compliance and performance of the service, focussed on compliance with health and safety requirements of a landlord.
- Briefings from the Statutory Compliance Co-ordinator, monitoring the programme of compliance on a regular basis.
- Public Sector Partnership Services Ltd audit the Housing Department on a three yearly basis to measure the effectiveness of the Health & Safety management system and gather evidence (view records, ask questions, etc) to assess working practice against existing policies, procedures and legislative requirements. Required actions will be captured by the Health and Safety team and followed up as appropriate to ensure completion. Findings are reported to the Assistant Director – Housing and the Strategic Health and Safety Board (chaired by the Assistant Director – Regulation and Corporate Lead Officer for Health and Safety).

### Electrical Safety

All electrical work is carried out by registered electrical persons who are suitably qualified and registered with an appropriate registration scheme, for example: NICEIC, NAPIT.

All new installations are provided with an Electrical Installation Certificate complete with a schedule of inspection and test results. These certificates are completed and in compliance with 'BS 7671: (2015) Requirements for Electrical Installations, Guidance Note 1 (Selection and Erection)' and all current amendments. All certificates are stored on the intranet and relevant contractor portal.

Processes are in place to ensure:

- Electrical installation condition tests and inspections are carried out on a minimum programme of every 5 years after the initial electrical installation date.
- All engineers working on electrical installations are NICEIC registered and competent for any servicing, inspection, repair, or replacement activities they are instructed to carry out.
- Empty properties and properties where tenants wish to undertake a mutual exchange have an EICR undertaken prior to relet.
- An electronic Electrical Inspection Condition Report (EICR) is provided to the Council, and a paper copy sent to the tenant upon completion of an inspection.

### Gas Safety

The Council services all gas heating appliances within one year of the previous inspection to ensure all properties have a valid safety inspection certificate. A 10 month cyclical programme of servicing is conducted to allow sufficient time to gain access to service appliances within the required 12-month period. In addition to the requirements of the gas safety check, contractors are required to ensure that working carbon monoxide detection systems are in place, providing additional information to document their findings. Gas safety checks are also conducted when a property is void and before tenants enter into a mutual exchange – copies of certificates are provided to the incoming tenant.

All gas work is carried out by individuals that are Gas Safe Registered and competent for any servicing, inspection, repair, or replacement activities they are instructed to carry out. A certificate (CP12) issued to the tenant in person or by post and stored on the intranet and contractor portal.



Processes are in place to ensure:

- Contractors are audited and supervised – 10% of gas servicing and installation works completed are subject to an independent audit.
- Accredited Certification Scheme (ACS) and relevant qualifications are maintained and renewed, when required, for all service engineers (including agency staff and sub-contractors).
- All properties with an open flued gas appliance have a working Carbon Monoxide detector
- All engineers/contractors are Gas Safe registered and provide proof of their registration prior to being allowed to undertake any works.
- The Council maintains an up-to-date database of all service records and manages the programme of servicing.
- The Council is informed of any installations deemed to be unsafe.

The Council's contractor:

- Maintains a complete servicing database of all the council's property assets.
- Maintains a database for the data storage of all inspection information, which must be retained for the duration of the contract.
- Checks all certificates before releasing them to the Council and ensuring the appointed person has signed and dated the safety certificate (or electronically authorised) to show the record is accurate.
- Ensures all certificates are passed to the Council in a timely manner and issued to the property address within the required timeframes.

#### Asbestos Management

The Council has an Asbestos Management Plan in place to support the monitoring and recording of asbestos containing materials (ACM) identified.

Work to encapsulate or remove high risk asbestos will only be carried out by an approved by a suitably qualified competent contractor with an appropriate HSE licence. Work to encapsulate or remove low risk asbestos will be carried out by competent qualified individuals. All training standards and qualifications held by Contractor's operatives must comply with the Control of Asbestos Regulations 2012.

All license work, surveys and sampling tests, as required, are completed by a contractor on behalf of the Council. The Council's Management Surveys and Asbestos registers are held on the intranet and are readily available for inclusion in any information packs provided.

Processes are in place to ensure:

- Contractors demonstrate that their operatives have completed appropriate asbestos awareness training; have safe systems of work in place for work adjacent to ACMs and that employees have been informed on emergency arrangements in case of damage or disturbance to ACM materials.
- Management surveys are in place to identify the location; type of ACM; its condition and quantified the risk posed.
- A register of asbestos is maintained.
- A rolling programme of re-inspections is undertaken on an annual basis.

- All staff who work directly or indirectly on properties which may contain asbestos are trained to understand the risks and how to manage them.
- That work does not begin on properties known or suspected to contain ACM's until the relevant survey has been completed or confirmation that data already held in this system is accurate and sufficient for the required works.

### Water Hygiene

The Council has robust control measures in place to ensure that the risks associated with the supply of hot and cold-water services, such as legionella bacteria, are effectively managed in all homes and communal areas.

Water Hygiene within the Councils housing stock is managed by risk assessment. Formal risk assessments are provided for communal water systems. All Risk assessments, written schemes of work and any other documentation is retained on the intranet.

Processes are in place to ensure:

- All assessments are undertaken by qualified assessors and that all works and testing regime comply with HSG274 Part 2: the control of legionella bacteria in hot and cold water systems.
- Water risk is reviewed when a property becomes void, as part of the voids process.
- Risk assessments for all relevant properties are undertaken every 2 years in line with the LS Approved Code of Practice and ensures all actions identified are completed with the timescales identified in the risk assessment.
- Individual dwellings not connected to communal water supplies are risk assessed by a desk top exercise which will consider risk based on the type of domestic hot water system and actions due. Where applicable, water hygiene will be delivered on an annual programme.
- Information to residents on the risks of legionella are included on our website at <https://www.sholland.gov.uk/legionella> and distributed to tenants on a regular basis and as part of sign-up.

### Lifts and stairlifts

All lift safety work is carried out by suitably qualified engineers. Certificates are stored on the intranet.

Processes are in place to ensure:

- All works and servicing to lifts and specialist equipment are undertaken by qualified and experience engineers who hold qualifications and relevant experience to that equipment.
- Any engineer's undertaking work is expected to put in place relevant isolation and safety measure to prevent unauthorised use whilst works are taking place and ensure residents and occasional users of the building are fully informed during the works.
- All passenger lifts are fully serviced annually, and a maintenance check is undertaken on a quarterly basis. Where lifts are to be decommissioned and no practicable alternative is available, Council housing officers will engage all residents affected and put in place appropriate support plans.
- Stairlifts and other specialist equipment is serviced in accordance with the requirements of LOLER and manufacturers guidance.
- A register of all specialist equipment is held and recorded.

### Where work is contracted out

Processes are in place to ensure:

- All contractors provide relevant insurance and indemnities prior to starting works.
- All contractors provide proof of qualification and accreditation with necessary schemes.
- Regular meetings held with compliance contractors – these meetings are recorded with any non-conformances noted and reviewed at the next meeting. If the contractor is failing to fulfil their requirements, the Council will follow the escalation procedure for failure to provide.
- Work is audited and supervised, with arrangements specified in contracts and monitored.

### Health and Safety responsibilities as an employer – Housing Repairs Team

The Health and Safety at Work Act 1974 (HSAWA) determines the framework by which all health and safety is managed in the workplace. The legislation covers both the obligations for employers and employees.

The Housing Repairs Manager is responsible for ensuring that they are competent and have an in-date health and safety qualification, in order to safely conduct the duties of a 'competent person' to oversee the health and safety of the Housing Repairs Team. Their role includes providing training to ensure all health and safety practices and procedures are well understood in the workplace and any implemented systems of work or risk assessments are followed.

Processes in place include:

- Safe Systems of Work outlining and detailing the tasks which would normally be found whilst performing the duties of a Repairs Operative.
- Risk Assessments outlining and detail the risks involved whilst performing tasks which would normally be found whilst conducting the duties of a Repairs Operative.
- Safe equipment – all equipment and/or tools provided for use are suitable for the intended use, safe for use, maintained in a safe condition and inspected. Daily checks are in place for battery and mains operated power tools of which the operator carries out to ensure all safety devices guards are intact and working and that the tool is fit for use.
- Ladder safety – a register detailing the location and type of ladder along with an annual inspection regime.
- Personal Protective Equipment – provided and employees trained on how to use and properly wear the PPE.
- Competent persons – all relevant trade craft certificates, relating to specialist trades are validated and inspected before the commencement of employment. Cyclical training is provided to all operatives, including asbestos, working at height, health and safety, first aid, manual handling, needle stick and any specialist trade training and/or trade governing body membership required.

### Arrangements for tenants to raise concerns with the Lead Officer for Health and Safety

Enquiries can be sent to [housing.regulation@sholland.gov.uk](mailto:housing.regulation@sholland.gov.uk) or by phoning 01775 761161. This information has been shared with tenants in the following ways:

- Housing annual report 2023/24, published July 2024
- our website at <https://www.sholland.gov.uk/about-your-landlord>
- included in sign-up packs for new tenants
- included in mutual exchange paperwork

- published in Sheltered Housing community centres and flat schemes.

## Responsible Person for Fire Safety (landlord)

The Council recognises its responsibilities under the Regulatory Reform (Fire Safety) Order 2005, The Fire Safety Act 2022 and the Housing Act 2004, The Building Regulations, and other relevant legislation to demonstrate and implement robust control measures to facilitate in the continuous conformity with legislation in the management of Fire risk. As per the Regulatory Reform (Fire Safety) Order 2005 (RRFSO 2005), the Council as a Landlord/Owner is a Responsible Person for the purpose of the legislation and therefore must comply with the legal duties imposed. It is the responsibility of the Responsible Person and those they appoint to assist them, to comply with the fire safety legislation.

### Individual appointed for 2024/25

Chief Executive of South Holland District Council, delegating duties and actions associated to fire safety within the Housing Landlord Service to Assistant Director – Housing.

### Summary of role and responsibilities

The principal fire safety legislation applicable to England comprises:

- The Regulatory Reform (Fire Safety) Order 2005 (the 'Fire Safety Order')
- The Fire Safety (England) Regulations 2022.
- The Fire Safety Act 2021.

The Fire Safety Order applies to the common parts (communal corridors and stairways) of blocks of flats and houses in multiple occupation (HMOs). The Fire Safety (England) Regulations make additional requirements for fire safety measures in blocks of flats, particularly those blocks over 18 metres in height.

The Home Office's 'A guide for persons with duties under the Regulatory Reform (Fire Safety) Order 2005 (as amended) and the Fire Safety (England) Regulations 2022' summarises the roles and responsibilities of a Responsible Person for Fire Safety. A copy is available at [https://assets.publishing.service.gov.uk/media/651567fe7c2c4a001395e180/14.310\\_HO\\_How\\_To\\_Guide\\_FINAL\\_RX\\_v04\\_.pdf](https://assets.publishing.service.gov.uk/media/651567fe7c2c4a001395e180/14.310_HO_How_To_Guide_FINAL_RX_v04_.pdf)

The Building Safety Act 2022 poses additional fire safety responsibilities, as summarised in the Home Office guidance 'Check your fire safety responsibilities under Section 156 of the Building Safety Act 2022'. A copy is available at <https://assets.publishing.service.gov.uk/media/6538e73fd10f3500139a68d0/Fire+safety+responsibilities+under+Section+156+of+the+Building+Safety+Act+2022.pdf>

### Arrangements in place to provide assurance to this individual and the organisation

Fire Risk Assessments are carried out by individuals accredited by UKAS Certification such as:

- FRACS [Fire Risk Assessor Certification Scheme: Number 73],
- NAFRAR [Nationally Accredited Fire Risk Assessment Register: [Tier 3] Number 0151]
- BAFE SP 205 Silver NSI Silver UKAS.

A fire safety arrangements procedure has been produced summarising the arrangements for effectively managing fire safety regarding properties within the Council's Housing Landlord Service in accordance with the relevant legislation, including:

- suitable and sufficient fire safety precautions;
- risk assessment; and
- management of fire safety arrangements.

A Compliance matrix is monitored by the Statutory Compliance Co-ordinator, evidencing completion of routine checks on emergency lighting, fire alarms and fire equipment.

Assurance on fire safety is provided to the Assistant Director – Housing in the following ways:

- Housing Landlord Services Compliance Clinic – reviewing the compliance and performance of the service, focussed on compliance with health and safety requirements of a landlord including fire safety and actions outstanding and overdue.
- Receiving copies of all Fire Risk Assessments
- Having oversight of outstanding fire actions and authorising actions for closure.

Processes are in place to ensure:

- Fire Risk Assessments are completed annually by an independent and competent Fire Risk Assessor on an annual basis. A copy of each FRA is shared with the Assistant Director - Housing with risks scored. Copies of FRAs are saved to the intranet.
- Management actions and remedial works arising from the FRA and Compartmentation surveys are actioned and tracked to completion. Any remedial works which cannot be or are not delivered within advised timescales will be assessed by the Assistant Director – Housing and appropriate risk mitigation measures will be taken to ensure ongoing tenant/ resident safety. Evidence of completion includes photographs and relevant certification. The Statutory Compliance Co-ordinator takes responsibility for collating (and saving) evidence for closure of Fire Risk Assessment actions. Each action is sent to the Assistant Director – Housing for approval to close.
- All fire breaks, seals, and doors are recorded at installation and saved on the intranet. The condition of accessible breaks and seals is checked during the FRA review process. All council employees and contractors are required to report breaches in compartmentation identified during their day-to-day operations.
- A rolling programme of flat fire door and communal door set inspection and maintenance is in place, with evidence saved to the intranet.
- Any contact with the Fire and Rescue Service is reported to the Assistant Director – Housing.
- Fire Safety systems and fire safety equipment, where fitted, are maintained to the recommended standards through regular programmes of cyclical maintenance.
- Fire Safety in blocks is monitored on a weekly and monthly basis through internal safety checks, recorded on I Auditor app.
- All vulnerable tenants living in flat schemes have a person-centred risk assessment (PCRA) to support fire management of the property.
- Arrangements for fire safety in individual dwellings is managed through the provision of domestic smoke detection systems, tested annually by the Council.
- The structure of individual dwellings is checked as part of stock condition surveys and during capital maintenance, for example, fire break walls will be checked during re-roofing projects.

No additional arrangements are in place for high rise buildings as the Council does not manage any buildings above 11 metres in height.

The Assistant Director – Housing provides six monthly updates to the Responsible Person for Fire Safety discussing findings of Fire Risk Assessments, progress of actions, changes in legislation and any other fire safety related matters regarding the Housing Landlord Service. Additional meetings are held where there are emerging or urgent items that require escalating to the Responsible Person, as determined by the Assistant Director-Housing.

[Arrangements for tenants to raise concerns with the Responsible Person for Fire Safety](#)  
Enquiries can be sent to [housing.regulation@sholland.gov.uk](mailto:housing.regulation@sholland.gov.uk) or by phoning 01775 761161. This information has been shared with tenants in the following ways:

- Housing annual report 2023/24, published July 2024
- our website at <https://www.sholland.gov.uk/about-your-landlord>
- included in sign-up packs for new tenants
- included in mutual exchange paperwork
- published in Sheltered Housing community centres and flat schemes.

## Accountable Person for Higher Risk Residential Buildings

Individual appointed for 2024/25

Assistant Director – Housing

### Summary of role and responsibilities

The Building Safety Act 2022 introduced new roles and legal duties for people and organisations who are responsible for managing building safety risks in higher-risk residential buildings (HRBs) in England. The Act identifies the need to appoint an 'Accountable Person' for residential higher-risk residential buildings. Higher-risk buildings are defined as a building in England that—

- a. is at least 18 metres in height or has at least 7 storeys, and
- b. contains at least 2 residential units.

The Accountable Person has a duty to take all reasonable steps to:

- prevent a building safety risk (the risk of a fire spreading or a structural failure) from happening; and
- reduce the seriousness of any risk that arises.

### Arrangements in place to provide assurance to this individual and the organisation

No arrangements in place currently as the Council does not manage any units over 11m in height.

### Arrangements for tenants to raise concerns with the Accountable Person for Higher Risk Residential Buildings

Enquiries can be sent to [housing.regulation@sholland.gov.uk](mailto:housing.regulation@sholland.gov.uk) or by phoning 01775 761161. This information has been shared with tenants in the following ways:

- Housing annual report 2023/24, published July 2024
- our website at <https://www.sholland.gov.uk/about-your-landlord>
- included in sign-up packs for new tenants
- included in mutual exchange paperwork
- published in Sheltered Housing community centres and flat schemes.

## Member Responsible for Complaints (MRC)

Individual appointed for 2024/25

Portfolio Holder – Strategic and Operational Housing

### Summary of role and responsibilities

Required as part of the statutory Housing Ombudsman Complaint Handling Code, 1 April 2024.

The MRC is responsible for ensuring that complaint handling drives service improvement for residents and learning and business improvement for the organisation. The role of the MRC is to champion a positive complaint handling culture and build effective relationships with complaints teams, residents, its audit and risk committees as well wider teams and the Housing Ombudsman Service.

The MRC should seek assurances that complaints are being managed, change is happening and that tenants are being heard through the process. See <https://www.housing-ombudsman.org.uk/centre-for-learning/key-topics/mrc/> for further information about the role.

### Arrangements in place to provide assurance to this individual and the organisation

The Member Responsible for Complaints is subject to regular updates on the Housing Landlord Service's compliance with the Housing Ombudsman's Complaint Handling Code in the following ways:

- Briefings from the Lead Officer for Housing Complaints every six weeks covering the following:
  - Compliments received.
  - The volume, categories and outcome of complaints/service requests.
  - Complaint handling performance including compliance with the Ombudsman's orders, specifically timescales taken to respond.
  - Issues and trends arising from complaint handling.
  - Individual complaint outcomes, where necessary, including where the Ombudsman has made findings of severe maladministration or referrals to regulatory bodies.
  - Compensation payments awarded.
- A copy of the annual performance report produced by the Ombudsman, where applicable.
- A copy of the annual self-assessment against the Complaint Handling Code, for scrutiny and challenge.
- Housing Landlord Services Compliance Clinic (Chair) – data on complaint handling performance
- Housing Landlord Services Governance Clinic (Chair) – information on complaints including complaint themes, learnings and trends, tenant satisfaction (perception) data, complaint handling survey responses, service improvements made in response to complaints.
- notification and updates on the outcomes of the Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings.
- Housing Landlord Board – compliance with the Housing Ombudsman Complaint Handling Code.

## Arrangements for tenants to raise concerns with the Member Responsible for Complaints

Enquiries can be sent to [housingcomplaints@sholland.gov.uk](mailto:housingcomplaints@sholland.gov.uk) or by phoning 01775 761161. This information has been shared with tenants in the following ways:

- Housing annual report 2023/24, published July 2024
- our website at <https://www.sholland.gov.uk/about-your-landlord> and <https://www.sholland.gov.uk/Housing-Feedback>
- included in sign-up packs for new tenants
- included in mutual exchange paperwork
- published in Sheltered Housing community centres and flat schemes
- annual complaints performance and service improvement report.

## Lead Officer for Housing Complaints

Individual appointed for 2024/25

Business Support Manager

### Summary of role and responsibilities

Required as part of the statutory Housing Ombudsman Complaint Handling Code, 1 April 2024. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision. The Lead Officer is responsible for ensuring compliance with the Comments, Compliments, Complaints & Compensation policy and the Housing Ombudsman Code.

As part of this role, they lead on Ombudsman's investigations and progress made in complying with orders related to severe maladministration findings. They also produce the annual complaints performance and service improvement report including the annual self-assessment.

The Lead Officer briefs the Member Responsible for Complaints on a 6 weekly basis, and Cabinet on a six monthly basis on the following:

- Compliments received
- The volume, categories and outcome of complaints/service requests
- Complaint handling performance including compliance with the Ombudsman's orders, specifically timescales taken to respond
- Issues and trends arising from complaint handling
- Individual complaint outcomes, where necessary, including where the Ombudsman has made findings of severe maladministration or referrals to regulatory bodies
- Compensation payments awarded.
- A copy of the annual performance report produced by the Ombudsman, where applicable.
- A copy of the annual self-assessment against the Complaint Handling Code for scrutiny and challenge.

### Arrangements in place to provide assurance to this individual and the organisation

The Lead Officer receives assurance regarding complaint handling in the following ways:

- Housing Landlord Services Compliance Clinic – data on complaint handling performance



- Housing Landlord Services Governance Clinic – information on complaints including complaint themes, learnings and trends, tenant satisfaction (perception) data, complaint handling survey responses, service improvements made in response to complaints.
- notification and updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings
- Housing Landlord Board – compliance with the Housing Ombudsman Complaint Handling Code
- Direct dialogue with Housing Managers on a daily basis.

### Arrangements for tenants to raise concerns with the Lead Officer for Housing Complaints

Enquiries can be sent to [housingcomplaints@sholland.gov.uk](mailto:housingcomplaints@sholland.gov.uk) or by phoning 01775 761161. This information has been shared with tenants in the following ways:

- Housing annual report 2023/24, published July 2024
- our website at <https://www.sholland.gov.uk/about-your-landlord> and <https://www.sholland.gov.uk/Housing-Feedback>
- included in sign-up packs for new tenants
- included in mutual exchange paperwork
- published in Sheltered Housing community centres and flat schemes
- annual complaints performance and service improvement report.