

REPORT TITLE: HOUSING COMPLIANCE POLICIES

4 NOVEMBER 2025

REPORT OF CABINET MEMBER: Mark Reach, Cabinet Member, Good Homes

Contact Officer: Gillian Knight Tel No: 01962 848 577 Email
gknight@winchester.gov.uk

WARD(S): ALL

PURPOSE

The HRA housing repair and maintenance compliance policies and procedures for approval and adoption in this paper have been developed as a business need, to comply with the Regulator of Social Housing's consumer standards and in support of the housing procurement of the HRA Council Housing Repair, Maintenance and Compliance Activities Contract approved at Cabinet Committee on 21 May 2025 (CAB3506).

The landscape of housing property compliance continues to evolve rapidly, driven by legislative reform, heightened safety expectations and a renewed focus on resident safety. There is a need to navigate a complex framework of statutory obligations, regulatory standards and best practice guidance to ensure council homes are safe and legally compliant. The legislative reform and regulatory frameworks are complemented by the Regulator of Social Housing's consumer standards which set expectations for safety, quality, transparency and tenant accountability.

To ensure the repairs and maintenance compliance policies meet the requirements of the legislative and regulatory framework. Pennington's Choices, specialist property and surveying consultants have been commissioned as subject matter experts to develop the six compliance policies.

A key objective of the six health and safety compliance policies is to provide assurance that senior management, housing staff, partner contractors and our tenants are clear on our housing landlord legal and regulatory safety obligations.

RECOMMENDATIONS:

1. That Cabinet Committee: Housing is asked to approve and adopt the 6 Housing Repairs and Maintenance Compliance Policies:
 - Fire Safety Policy
 - Gas and Heating Policy
 - Electrical Safety Policy
 - Asbestos Policy
 - Water Hygiene Policy
 - Lift Safety Policy
2. That Cabinet Committee Housing:
 - a) Delegate to the Corporate Head of Housing, in consultation with the Cabinet Member for Good Homes, to make any minor amendments to the policies.

IMPLICATIONS:

1 COUNCIL PLAN OUTCOME

1.1 Greener Faster

Greener Homes' is one of the key strategic objectives within the Housing Strategy (2023 - 2028) and will help develop and support a greener district to address the climate emergency. The procurement of the repairs, maintenance and compliance contract will include a requirement for bidders to outline how they will contribute to the council's carbon reduction targets. Providing clear policies and procedures that outline service expectations is a critical component of the tender process, as they inform an integral part of the contractual framework, including service management and performance indicators.

1.2 Thriving Places

Delivering a compliant and quality repair and maintenance service is essential for our tenants who often view how well the repairs service is run as representative of the performance of the council housing landlord. The views of residents is a key driver in designing and setting the new service standards for the Repairs and Maintenance redesign work. The tender process will encourage and assess how suppliers can incorporate the use of local market in delivering council home repairs and maintenance services with the aim of contributing to prosperity and resilience of the local economy.

1.3 Healthy Communities

Good housing is crucial for healthy communities as it directly impacts on physical and mental well-being it can enhance overall safety, quality of life, promote healthy behaviours and reduce health inequalities. Part of the repairs, maintenance and compliance contract tender evaluation will assess the social value that contractors will deliver to enhance and support local communities. The provision of compliant policies and procedures setting out the service principles and procedures will support this work.

1.4 Good Homes for All

Repairs and maintenance have a direct influence on the quality of the council's housing stock and on the wellbeing of our tenants' lives. The repairs, maintenance and compliance redesign contract will improve, repair and

increase the lifespan of a property's fabric while ensuring that residents' homes meet decency standards, comply with the Housing Health and Safety Rating system (HHSRS) and meet housing regulatory requirements. The provision of compliant repairs and maintenance policies and procedures setting out the service principles and procedures will help tenants and stakeholders to hold the council landlord to account and drive improvements in customer satisfaction and efficiency of delivery.

1.5 Efficient and Effective

Sector specialist property surveying and consultancy advice has been commissioned to develop the six compliance repairs and maintenance policies to provide safety assurance and to ensure the most efficient options are in place to raise repair requests. This will support the aim of a first-time fix for tenants, reduce repeat visits and support improved tenant satisfaction levels. The provision of compliant policies and procedures setting out these service principles will enhance efficiency methods.

1.6 Listening and Learning

- 1.7 The six supporting compliance policy aims and priorities help define firm expectations for the Housing Revenue Account (HRA) Council Housing Repair, Maintenance and Compliance Activities Contract. These expectations will require bidders to demonstrate a shared and proactive commitment to effective tenant communication and tenant satisfaction. This is considered a core contractual obligation and collective responsibility with a strong emphasis on the appointed contractor fostering a resident centric culture in the delivery of services.

2 FINANCIAL IMPLICATIONS

- 2.1 The compliance policies and procedures have been developed and updated to support procurement of the repairs, maintenance and compliance contracts which will be delivered and monitored within existing staffing resources. The business plan agreed in February 2025 included agreed estimates of reactive repair, void costs and compliance works within the scope of the repairs, maintenance and compliance policy principles and aims, the HRA revenue budget, and within the capital programme for planned and reactive maintenance works.
- 2.2 The overall HRA revenue budget in the agreed business plan supports the delivery aims of the proposed repairs and maintenance compliance policies for the revenue works that are within the scope of the repairs, maintenance and

compliance contract procurement is £56.7m, and capital budget for works in scope is £43.7m over the repairs and maintenance 4+3 contract period.

3 LEGAL AND PROCUREMENT IMPLICATIONS

- 3.1 Housing property compliance continues to evolve driven by legislative reform, heightened safety expectations and a renewed focus on tenant safety. There is a need to navigate a complex framework of statutory obligations, regulatory standards and best practice guidance to ensure council homes are safe and legally compliant.

- 3.2 Recent legislative has reshaped compliance requirements through:

Awaab's Law, introduced under the Social Housing (Regulation) Act 2023, mandates that social landlords address emergency hazards including damp and mould within strict timeframes. The first phase of implementation begins in October 2025, with further hazard categories added in 2026 and 2027.

Decent Homes Standard is undergoing a major review, with proposed changes focusing on enforceability, updated definitions of disrepair, and new safety measures such as window restrictors.

Housing Health and Safety Rating System (HHSRS) is being streamlined, reducing the number of hazard categories and introducing clearer enforcement guidance.

Building Safety Act 2022 continues to influence compliance, particularly around fire safety, structural integrity, and tenant engagement.

Additional legislation applies individually to each of the six compliance policies outlined in section 4 of each policy.

- 3.3 The repairs and maintenance compliance policies are required for inclusion in the tender documents as part of the housing procurement of the HRA Council Housing Repair, Maintenance and Compliance Activities Contract.
- 3.4 The proposed principles and aims of the repairs, maintenance and compliance policies and procedures align with the new Procurement Act, where the basis of award is now referred to as the 'most advantageous tender' rather than, as in the previous legislation, the 'most economically advantageous tender' (MEAT). This enables the assessment of tenders against a range of 'quality and 'social value' factors to determine the best solution.

4 WORKFORCE IMPLICATIONS

- 4.1 The service commissioned Pennington Choice's, specialist property and surveying consultants as the subject matter expert to develop in partnership with officers the compliance policies and procedures for the six top areas of compliance related to property health and safety.
- 4.2 The operational delivery of the compliance policy and procedures work will be undertaken within existing and new staffing resources and current housing repairs and maintenance contracts. The Housing Revenue Account budget is in place to deliver on associated new staffing costs and revenue and capital works within the scope of the proposed housing compliance policies.

5 PROPERTY AND ASSET IMPLICATIONS

- 5.1 The housing repairs and maintenance compliance policies will support and drive changes that will improve the decency standards of council homes and comply with the Housing Health and Safety Rating (HHSRS) requirements and Awaab's Law legislation taking effect on 27 October 2025. Awaab's Law mandates social housing landlords to address damp and mould hazards and emergency repairs within strict timelines.

6 CONSULTATION AND COMMUNICATION

- 6.1 Pennington's Choice, as a sector expert and recognised authority in property and surveying has developed the six compliance policies. Accordingly, consultation is not directly sought on the individual policy context but instead to support understanding and implementation of the policies.
- 6.2 Each of the six compliance policies includes a resident engagement section designed to: encourage reporting of safety concerns; reach vulnerable and hard-to-reach residents; communicate information clearly and transparently; ensure accessibility through housing newsletters and the website; and provide resident-friendly versions of compliance communications and documents.
- 6.3 In June 2025, Pennington Choices facilitated six workshop sessions with housing staff at management level and with property technical operators to agree the policy principles and strategic choices to be applied for each of the six core compliance areas. The workshops looked at the ideal position, rather than how we currently operate to develop a set of policies to streamline and simplify the management of compliance.

- 6.4 The repairs and maintenance compliance policies were presented to the Economy and Housing Committee on 16 September 2025 (*feedback to be added to the report*).
- 6.5 Tenant engagement to support the understanding and implementation of the six repairs and maintenance compliance policies is scheduled to take place from 12 September 2025 to 3 October 2025, through digital surveys. Tenant feedback will be collated and reported to the TACT Board on 8 October 25. (*feedback to be added to the report*)
- 6.6 We have other new tenant engagement platforms in place where tenants have further opportunities to monitor policy work to influence change, help fine tune policies and identify gaps in service that may need policy intervention.

7 ENVIRONMENTAL CONSIDERATIONS

- 7.1 The Term Contractor(s) for the HRA Council Homes Housing Repairs, Maintenance and Compliance Activities Contract supported by compliant policies and procedures requires the successful bidder to support the council's Carbon Neutrality objectives and Nature Emergency.

8 PUBLIC SECTOR EQUALITY DUTY

- 8.1 Equality Impact Assessments were undertaken on the overarching service Repair and Maintenance policies in June 2025 and explored the potential impacts on tenants, particularly those with protected characteristics under the Equality Act 2010. The assessment process anticipated variations in tenant circumstances and the ways in which the policies can be applied to mitigate against any adverse effects on tenants.
- 8.2 Equality Impact Assessments on the six-housing compliance policies are scheduled to be undertaken in September and this report updated with the findings to include examples of how the policies can be applied to mitigate against any identified adverse effects on tenants.
- 8.3 Whilst the proposed compliance policies carry potential impacts, the Equality Impact Assessments will demonstrate that through adaptive design and processes, inclusive communication, access and ongoing monitoring, adverse effects can be mitigated, ensuring fairness and compliance with equality obligations to ensure there is little or no differential impact on tenants.
- 8.4 The successful bidder for the Council Homes Repair and Maintenance and Compliance Activities Contract (retender process) will be required to adhere

to the council's Equality Policy. As part of the tender evaluation bidders must disclose complaints made against them within the past three years, that were upheld following an investigation by the Equality and Human Rights Commission or an equivalent body.

9 DATA PROTECTION IMPACT ASSESSMENT

- 9.1 The proposed housing repair and maintenance compliance policies and procedures are operational business service policies for guidance and information and do not collect personal data. Personal data is collected, used or processed as part of current housing data systems in accordance with the data protection principles and legislation.

10 RISK MANAGEMENT

- 10.1 There are more opportunities than risk associated with the development and implementation of the six compliance policies and procedures developed in partnership with Pennington Choice's, specialist property and surveying consultants.
- 10.2 The potential business risk is a current lack of up-to-date compliant policies associated with the six top areas of compliance for property health and safety.

Risk	Mitigation	Opportunities
Financial Exposure	HRA Business Plan and revenue and capital budgets in place to support delivery of the associated work within the repairs and maintenance policies.	Demonstrate financial commitment of health safety compliance across the councils housing stock within statutory and regulatory requirements. Improved Regulator TSM results. Reduced complaint handling.
Exposure to challenge	The policies will be monitored and reviewed every two years or sooner if there is a change in legislation that effects the policy focus.	
Innovation	Commission of Pennington Choice's, specialist property and surveying consultants as	Meeting the Regulator for Social Housing (RSH) consumer standards requirements and in

	the subject matter experts to develop the compliance health and safety policies.	readiness for the RSH inspection.
Reputation	Enhanced compliant repairs and maintenance reputation of works through clear and transparent repairs and maintenance policies in place.	Demonstration of commitment towards health safety compliance across council homes. Meeting the RSH consumer standards requirements
Achievement of outcome	Demonstration of commitment to health safety across our homes through clear and transparent policies that provide guidance and information in respect of tenants and landlord repair and maintenance compliance responsibilities,	Improved tenant Repairs and Maintenance satisfaction levels. Improved Regulator TSM results. Reduced complaint handling.
Property	Housing compliance policies support and drive changes that will improve the decency standards of council homes and ensure compliance with legislative and regulatory frameworks.	Ensures consistent and efficient service delivery, reduced legal risk, sets clear expectations between landlord and tenants and promotes a positive repairs and maintenance culture of responsibilities.
Community Support	Consultation with tenants and stakeholders to provide collaboration of views and ensure the tenants voice is heard within the policy making process.	New tenant engagement platforms in place for tenant opportunities to monitor policy work influence change, help fine tune policies and identify gaps in service that may need policy intervention.
Timescales	The policies have been delivered within the scope of the project timescales supported by external consultants.	

Project capacity	Delivered within current and new staffing resources and budget resources in the agreed in HRA Business Plan	
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11 SUPPORTING INFORMATION:

Background

- 11.1 The landscape of housing property compliance continues to evolve rapidly, driven by legislative reform, heightened safety expectations and a renewed focus on tenant safety. There is a need to navigate a complex framework of statutory obligations, regulatory standards and best practice guidance to ensure council homes are safe and legally compliant.
- 11.2 The legislative reform and regulatory frameworks are complemented by the Regulator of Social Housing's consumer standards which set expectations for safety, quality, transparency and tenant accountability.
- 11.3 To ensure the big six repairs and maintenance compliance policies meet the legislative and regulatory framework requirements we commissioned Pennington's Choices, specialist property and surveying consultants as subject matter experts to develop in partnership the six compliance policies.
- 11.4 The repairs and maintenance compliance policies are also required as part of the housing procurement of the HRA Council Housing Repair, Maintenance and Compliance Activities Contract approved at Cabinet Committee on 21 May 2025 (CAB3506).
- 11.5 Pennington's Choices bring industry wide best practice knowledge across significantly reshaped compliance requirements to help apply a consistent approach across our policies and procedures. To support the development of a suite of property compliance policies that clearly define our obligations and guiding principles across six core compliance areas.
- 11.6 The core compliance areas that social housing landlords are expected to maintain with rigorous oversight are across six key health and safety domains:
 - Fire Safety Policy
 - Gas Safety Policy
 - Electrical Safety Policy
 - Asbestos Policy
 - Water Hygiene Policy
 - Lift Safety Policy

- 11.7 The compliance policies incorporate compliance requirements in respect of Awaab's law, Decent Homes Standard, and Housing Health and Safety Rating System (HHSRS). The Building Safety Act 2022 which continues to influence compliance, particularly fire safety, structural integrity of buildings and tenant engagement.
- 11.8 The compliance policies define roles and responsibilities, ensure contractor and staff awareness, and ensure a culture of respect and accountability
- 11.9 The compliance policies will be monitored and reviewed every two years or sooner if there is a change in legislation that effects the policy focus.

Conclusion.

The housing repair and maintenance compliance policies for approval and adoption ensure compliant, consistent and efficient service delivery across the six core health safety areas of responsibilities within our council homes.

They are part of our wider commitment to drive a health and safety culture amongst staff and contractors, reduce legal risk and to set clear expectations between landlord and tenants to promote a positive repairs and maintenance culture of responsibilities.

They help provide a framework for decision making and procedure guides for staff and help clarify and communicate service principals to promote a positive culture and a climate of diversity and inclusion to create positive outcomes for our staff and tenants.

The housing service is committed to achieving and maintaining full compliance across the councils housing stock within statutory and regulatory requirements for the six core compliance policies for fire safety, gas safety, electrical safety, asbestos management, water hygiene, and lift maintenance.

- 11.10 The six draft housing repairs and maintenance compliance policies can be found in appendences 1 to 6.

12 OTHER OPTIONS CONSIDERED AND REJECTED

No other options have been considered and rejected as it is a business need, legislative and regulatory requirement to have appropriate housing compliant policies in place. Together policies and procedures provide a roadmap for

day-to-day operations and ensure compliance with safety laws and regulations and provide guidance for decision-making.

BACKGROUND DOCUMENTS: -

Previous Committee Reports: -

CAB3506 Housing Repair, Maintenance and Compliance Activities Contract 21.5.25

CAB3512(H) Housing Repairs, Maintenance and Disabled Adaptations Policies
23.7.25

Other Background Documents: -

None.

APPENDICES:

- Appendix 1 - Fire Safety Policy
- Appendix 2 - Gas Safety Policy
- Appendix 3 - Electrical Safety Policy
- Appendix 4 - Asbestos Policy
- Appendix 5 - Water Hygiene Policy
- Appendix 6 - Lift Safety Policy