

# Cheltenham Borough Council Cabinet Housing Committee

**Meeting date:** 21 January 2026

**Meeting time:** 6.00 pm

**Meeting venue:** Council Chamber - Municipal Offices

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## **Membership:**

Councillor Glenn Andrews, Councillor Flo Clucas, Councillor Jan Foster, Councillor Julian Tooke (Chair) and Councillor Suzanne Williams (Vice-Chair)

Ian Mason (Tenant Representative), Lizzie Mawdsley (Leaseholder Representative) and Agnieszka Wisniewska (Tenant Representative)

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- 1 Apologies**
- 2 Declarations of interest**
- 3 Public and Member Questions**
- 4 Minutes of the last meeting (Pages 3 - 14)**
- 5 Director Briefing (if required) (Verbal)**
- 6 Housing Improvement Programme (Pages 15 - 24)**
- 7 Compliance Performance Data to 31 December 2025 (Pages 25 - 32)**
- 8 KPI performance data for August - November 2025 (Pages 33 - 36)**
- 9 Housing Health and Safety Rating System (HHSRS) and Damp, Mould and Condensation Policy (Pages 37 - 80)**
- 10 E-bike and Battery Policy (Pages 81 - 112)**
- 11 Q3 2025/26 Housing Complaints and Compliments Report (Pages 113 - 130)**
- 12 Anti-Social Behaviour Improvement Programme - Update (Pages 131 - 138)**
- 13 Updates from the Tenant and Leaseholder Panels (Pages 139 - 140)**
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# Cabinet Housing Committee Minutes

**Meeting date:** 26 November 2025

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**Present:**

**Councillors:**

Glenn Andrews, Flo Clucas, Jan Foster, Julian Tooke (Chair) and Suzanne Williams (Vice-Chair)

**Coopteers:**

Ian Mason and Lizzie Mawdsley

**Also in attendance:**

Claire Hughes (Director of Governance, Housing and Communities), Gemma Rowberry (Head of Regulatory Compliance), Caroline Walker (Director of Housing, Customer and Community Services) and Matt Ward (Head of Housing Services)

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## 1 Apologies

Apologies were received from Agnieszka Wisniewska.

## 2 Declarations of interest

There were none.

## 3 Public and Member Questions

Two public questions had been submitted; the responses were taken as read.

**Question from Mr. Richard Lawler**

**Standards for Waste and Recycling in Council Housing**

At Cobham Road and Queen Street, communal bin areas are currently located on mud or damaged surfaces, with no secure compounds and some blocks having no recycling facilities at all.

What plans does the Council have to ensure that all council-housing sites meet a clear minimum standard for waste storage — including hardstanding, individual household bins rather than large industrial ones where appropriate, secure cages,

CCTV at hotspots, and full recycling provision in line with Cheltenham's household waste standards?

**Response from Councillor Julian Tooke, Chair of the Cabinet Housing Committee**

Thank you for your question.

As a council, we are committed to identifying and upgrading bin areas that do not meet modern regulations or an acceptable standard. These improvements are dependent on factors such as the availability of suitable space, obtaining necessary planning permission, and securing sufficient budget. We have already upgraded a number of bin areas, and this work forms part of an ongoing programme of improvements.

Both 220-234 Swindon Road (adjoining Queen Street) and 28-33 Cobham Road have been identified for improvements, with the addition of hard standing for the bin areas, in the 2026-2027 financial year. This work will be managed by our Technical and Investment Team and will be overseen by our Senior Building Surveyor.

**Question from Mr. Richard Lawler**

**Leadership and Accountability for Estate Improvements** Does the Cabinet Housing Committee agree that the current conditions at these sites fall below what residents should expect from a modern, well-managed social-housing environment — and that rectifying them is an equality and dignity issue as much as an environmental one?

If so, would the Cabinet Housing Committee consider assigning a named senior officer to take direct ownership of coordinating the necessary improvements — recognising both the scale of the problem and the need to manage workloads across the Housing team — and arrange a joint on-site visit with ward representatives and interested parties?

**Response from Councillor Julian Tooke, Chair of the Cabinet Housing Committee**

Thank you for your question.

As a landlord we are committed to putting our tenants and leaseholders at the heart of our services and to listening and responding to concerns as they are raised, whether they are environmental, neighbourhood, community, or otherwise. We want all our tenants, leaseholders and shared owners to live in communities where they feel safe, that they are proud of and where everyone can thrive

As a committee we are unable to take decisions on the allocation of resources, however, we are confident that officers will take action as stated in my previous response to the question. If after those actions have been taken, they are still



unsatisfactory please feel free to get in touch again.

### **Supplementary Question**

Residents at Queen Street have raised concerns with me about the condition and design of the bin store. They tell me they often have to climb over rubbish just to reach the bins and many bags are now being kept on balconies because the waste area isn't fit for purpose. Can I ask whether the current bins and waste storage arrangements are considered appropriate for this site, and, if not, what steps the council's housing service will take to bring this block up to a safe and accessible standard.

### **Response from Councillor Julian Tooke, Chair of the Cabinet Housing Committee**

Unable to comment on the legalities and what is defined as safe and accessible in law as this is not my area of expertise. What I can say is when I look at the photo it does not look great. Thank you for raising this with the committee. It is really important that concerned residents and people like you who care bring up these things, we take them very seriously. The Head of Housing Services will take this action away and will come back to you with a response, including a time frame.

Once again want to emphasise how grateful we are that you have brought this up. On this committee our job is not to be a member of the council, but to act as a check and balance to the council.

### **4 Minutes of the last meeting**

To approve the minutes of the meeting held on 24th September 2025.

**RESOLVED THAT The minutes of the meeting held on 24 September 2025 were signed as a correct record.**

### **5 CEO/Director Briefing (if required) (Verbal)**

**Objective:** An update from the Director on key issues which may be of interest to the Cabinet Housing Committee.

The Director of Governance, Housing and Communities noted that there was no update on this occasion.

### **6 Rent Setting, Repairs, Empty Homes (Voids) and Recharge Policies**

**Objective:** To provide the committee with the Rent Setting, Voids, Recharge and Repairs policies for sign off and recommendation to cabinet for approval

The Director of Governance, Housing and Communities introduced the updated policies for consideration and recommendation to Cabinet for final sign-off. She explained that:

- The Rent Setting Policy explains how rent is set and reviewed, and sets out the differences in the types of rent.
- The Recharge Policy seeks to provide information to tenants about when they may be recharged for repairs. For example, if tenants have caused deliberate damage to the home the council may seek to recover the costs of repairing the damage from the tenants. This includes broken doors, windows, lost keys and unsafe DIY. It also provides information about when charges would not apply, for example if the damage was a result of crime and there is a crime number, or if it is a domestic abuse case.
- The Empty Homes (Voids) Policy sets out how voids will be managed going forward and sets out clearly what tenants can expect when they move into their new home, through a Lettable Standard. It also includes key performance indicators (KPIs) to ensure the committee and tenants are able to hold the council to account and track performance.
- The Repairs Policy covers repairs and maintenance for tenanted properties. Initially this had been intended to also cover leaseholder properties but feedback from the Leaseholder Forum made it clear that combining the two was leading to confusion and making it hard to follow. Currently working on a separate policy for leaseholders which will be taken to the Leaseholder Forum for consultation and then will be brought to the committee in January 2026.
- Each policy has had an equality impact assessment carried out and a summary document for tenants has been produced to aid with understanding and digestion. These will be provided to tenants via the website.

The committee's discussion raised the following points:

- Concern was raised about how kitchens are dealt with. It was noted that the policy does not include that when a kitchen is taken out, it must be replaced fully. It is important to ensure that the process ensures that nobody gets half a kitchen, and equipment matches. It was confirmed that an ongoing piece of work is being undertaken with the installation contractor and that this will be considered for inclusion within either the policy or the process documents that sit behind the policy.
- Previous discussions around the disposal of items that are still in good repair being removed were highlighted as non-sustainable. A hope was expressed that the council can move to a position where wherever possible improvements are maintained, especially as incoming tenants may not be able to afford to replace them. The Head of Housing Services assured the committee that where possible items are maintained. However, there are occasions where this is not straightforward. For example, kitchens and bathrooms need to have non-slip flooring to ensure safety, sometimes flooring has been fitted around furniture that has been removed, and sometimes there are asbestos tiles underneath. Where anything remaining is adequate a discussion is had with incoming tenants to confirm whether they would like to keep the items. If items are kept they will be noted on the tenancy sign-up as gifted, to reflect that the council will not maintain non-standard fixtures and fittings.

- If a private sale has occurred on the private market leaseholders may not be aware that there could be asbestos floor tiles that could be disturbed if removing flooring. This will be included within the Leaseholder Handbook to ensure that they are aware of the risk and consideration will be given to how to improve communication on this matter. Most asbestos tiles have already been removed but they may still be present in a minority of properties.

**The committee recommended that Cabinet approves:**

- **The Rent Setting Policy (Appendix 2)**
- **The Recharge Policy (Appendix 5)**
- **The Empty Homes (Voids) Policy (Appendix 8)**
- **The Repairs and Maintenance for Tenanted Properties Policy (Appendix 11)**

### **7 Compliance Performance data for October 2025 and KPI reporting for Q2**

**Objective:** To provide the committee with key performance information relating to voids, arrears, day to day repairs, ASB and property compliance.

The Director of Governance, Housing and Communities presented the report to the committee and provided the following updates:

- There are now five outstanding properties in relation to gas compliance, as one property has been handed back where the gas has been capped. There is no particular cause for concern with the remaining properties.
- At the time the report was written there were 15 actions relating to the installation of windows. This is now down to eight, with one property in each of the eight blocks waiting to be completed. Although three properties have been completed in each block, the action cannot be closed until the remaining properties are fitted. The delay in installation is due to a lack of access to the properties, so the usual no access procedure is being followed to gain access.
- Further detail around the stock condition surveys has been included in the report, including a breakdown of how many have been completed and what kind of archetypes. Future reports will also include data around the Decent Homes Standard compliance. Currently operating at 2.3% of homes not meeting the Decent Homes Standard, which relates to 108 properties. 77 of these relate to thermal comfort, and 31 relate to component failures, normally a kitchen or bathroom that needs replacing.

The committee's discussion raised the following points:

- Three high risk compartmentation issues were due to be completed on the 24 November but have been delayed due to contractor issues. Assurance has been given by the contractor that it will be signed off by the end of the month.
- The components listed in the report are generally kitchens or bathrooms with an element that cause them to not meet the Decent Homes Standard. An early draft of the 5-year planned maintenance programme has now been produced. Officers will compare properties that do not meet the Decent

Homes Standard against this plan to identify when it is scheduled for replacement and decide whether to reschedule it to an earlier point.

- Thermal comfort essentially relates to whether a house is too hot or too cold due to physical issues with the property. For example, due to window draughts, lack of draught excluders or over insulation.
- It is unlikely that 100% of stock condition surveys will have been completed by December. Currently trying to gain access to outstanding properties but this is a long process and has not yet been tested whether the court will allow forced access. Suspect that the courts will not allow forced access. Continuing to try new methods to carry out surveys, for example by carrying them out at the same time as responding to requested repairs.
- All social housing providers have been targeted with achieving EPC C or above by 2030. Energy Performance Certificate (EPC) reviews were taken out of the stock condition surveys to speed up the process. Aiming to provide details of properties EPC rating in future reports as the data is now available on the system. Already retrofitting properties which are below EPC C in an ongoing decarbonisation programme using Wave 3 funding from the government. This will also resolve some of the thermal comfort issues identified.
- Point 1.3.1 refers to one high-risk fire action awaiting determination on costs. Whilst it feels like this should be an easy decision it can be a significant cost. For example, internal compartmentation work can be in the hundreds of thousands of pounds range. The work will be carried out regardless of the cost, but it will need to be scheduled as part of the capital programme of works which is currently being discussed. Also need to ensure that contractors have priced the work to be compliant with the procurement process. Whenever a high-risk action is identified mitigations are put in place to minimise any risk and ensure tenants are protected whilst corrections are carried out, for example by changing evacuation procedures. However, they will continue to be listed as high-risk despite the mitigations in place to ensure the correct focus remains.
- The data from the stock condition surveys is being used to generate a future planned maintenance programme which will cover at least the next five years. This will be consulted on with both tenants and leaseholders, to ensure they are aware of what is coming down the line. It will not be possible to confirm how much things are going to cost at the consultation stage, particularly for the work scheduled for later years of the programme, but it should give an idea of what work is expected. There will always have to be some flexibility to the programme as elements such as roofs could fail unexpectedly and work will need to be reprioritised within the budget. It will be vital to keep tenants and leaseholders updated when these changes occur and be clear when delayed work will be completed. Accept that this is something that has failed in the past but that is being improved.
- Understand that changes can be very concerning for leaseholders. The Head of Housing Services will be bringing forward a policy around section 20s in early 2026 to clarify how the process works. Leaseholders will be consulted

on this policy. The process will also be helped by having a planned maintenance programme providing clearer insight into anticipated costs. Whilst this may change due to urgent works appearing, the council will accommodate leaseholders experiencing financial challenges through the various options available.

- Legally new leaseholders are provided with section 125 notices which commits the council to the work detailed. Anything additional added cannot be charged to the leaseholder. However, this is only for new leaseholders. During private sales the purchasing solicitor can request information on what work should be anticipated from the Technical and Investment team.
- Good to see that significant progress has been made around the stock condition surveys, which has been a significant concern. It was also highlighted that the surveyors have been very positive about the council's responsiveness to issues being identified. Pass on thanks of the committee to officers for the tremendous amount of work that has been carried out since housing has been brought back in-house. Enables the council to make tenants aware this is about their homes, and making sure that things are being done to improve them and make them better. Thank staff for understanding how important tenants are, and embracing this improvement journey.

### **8 Housing Services Health and Safety Report**

**Objective:** To review health and safety activity that has been undertaken during the period, whether it was successful, and identify current tasks and challenges being faced.

The Director of Governance, Housing and Communities, introduced the report and explained that it covers the work that has been happening relating to health and safety from July to September. This has included an inventory check of health and safety equipment, and Housing Health and Safety Rating System (HHSRS) training, with a HHSRS policy due to come to committee in January. The Ubico compliance team have also carried out an audit which has resulted in some actions which are currently being worked through. The report also includes an incident report covering April to September. The highest number of incidents remains unacceptable behaviour, generally verbal abuse from tenants towards staff. It also includes details of RIDDORs (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations), house fires and near misses.

The Committee's discussion raised the following points:

- The number of unacceptable behaviour incidents have come down significantly over the last few years.
- The causes of the increased number of fires have almost exclusively been related to e-bikes. A policy on managing this risk, incorporating best practice, will be brought to the committee in 2026.

## 9 Housing Improvement Plan

**Objective:** To provide the committee with a progress update on the Improvement Plan developed to resolve areas of non-compliance with the Regulator of Social Housing's Consumer Standards.

The Director of Governance, Housing and Communities introduced the report and explained that the new Consumer Standards had been introduced in April 2024. At some point the council will be inspected against these Standards and will be given a C1 – C4 grading. A number of gap analyses have been completed and a self-assessment has been included with the report. This has enabled a Housing Improvement Team to be created with an officer leading each Standard, which meet as a programme board monthly to review progress. Reports will be brought to the committee quarterly to report key highlights, risks and issues from the previous quarter, to enable the committee to hold officers to account. Progress on the improvement journey will also be reported regularly to the Tenant and Leaseholder panels and will be in the public domain, which will enable people to ask more questions.

The self-assessment was completed in August and the Housing Quality Network (HQN) were commissioned to review the self-assessment. This was initially reviewed on a desktop exercise basis, followed by a number of interviews, with a feedback session a fortnight ago. The feedback revealed no major surprises, with actions emerging matching those already on the action plans. Praise was given to the compliance strategy, it was highlighted that tenant satisfaction measures (TSMs) were strong when compared to the sector, and the overarching structure and governance was considered generally very good. The Director of Governance, Housing and Communities was pleased that HQN had confirmed that all staff were helpful, engaged and knowledgeable. Improvements were identified, for example updating policies that still say CBH which can be easily fixed. Where actions are longer term a plan is being created with key milestones that will be brought to the committee from January. HQN have also been asked to undertake a full mock inspection in January, which may include interviews with members of the committee. A feedback report will be produced at the end of the mock inspection, which will be shared with the committee.

## 10 6 monthly Tenant Satisfaction Measures (TSM) Tracker Update

**Objective:** To provide the committee with the 6 month position in relation to tenant satisfaction measures.

The Director of Housing – Customer and Community Services presented the report and explained that an independent company, Acuity, carry out telephone surveys with 250 different tenants every quarter. Key messages are that overall satisfaction has increased by 3% and the council is performing above 80% in six areas. The council is performing below 70% in relation to complaints handling, response to anti-social behaviour, and listening to tenant views and acting upon them. Currently

working on these areas and have contacted every dissatisfied customer identified through the survey to try to resolve any issues. This also allows themes to be identified to feed into future plans. In the past this has included the introduction of a text survey for those who have engaged in the complaints process, however this has had a very poor response rate. So the next step is to carry out a scrutiny meeting with those who have made complaints to understand if there are improvements that can be made to the process and to hopefully influence perceptions going forwards.

The Committee's discussion raised the following points:

- The TSM for complaints handling is complicated by the fact that regularly only 2 out of 10 people surveyed have actually made a complaint. So most are offering an opinion on a service they have not used. Where a complaint has been made, the outcome can also influence how people feel about the process. The questions are prescribed by the government, so it is not possible to change how this data is collected. This is a sector wide issue and concerns were raised about the TSM during the consultation period but were not acted upon. It is important to continue to seek to make the process better, which is why additional feedback from those who have used the service is being sought.
- Continuing to develop approach to contractor management and have been considering the process at leadership team. This should include quality testing a percentage of the work by the council to ensure work is being completed to a good standard. Not quite there yet but it is being worked on.
- The self-reported data shows a third of respondents reporting issues with damp, mould and condensation (DMC), which does not match what has emerged from the stock condition surveys. This is a good example of the importance of the follow-up calls. Around 18 months ago the organisation developed a sophisticated approach to DMC which involves scripts in the contact centre to understand the size and severity of the issue. Issues picked up through the quarterly surveys undergo the same process, so even if the tenant has not reported the problem directly, it will be picked up and remedied through the follow up call.
- Leaseholders are currently not adequately involved in the feedback process around repairs in communal areas. This is part of the regulatory standard and is an area of development for the council, to ensure that the feedback and communication loops are working well.

### **11 Q2 2025/26 Housing Complaints and Compliments Report**

**Objective:** To provide an overview of housing related complaints and compliments, identifying key areas of dissatisfaction and areas for learning and service improvement.

The Director of Housing – Customer and Community Services introduced the report. She explained that there had been difficulties in quarter one with processing complaints on time and delivering on target. With the support of the Director of Governance, Housing and Communities changes have been made so that all stage

one complaints are now dealt with by the Complaints team, effectively providing a resolution function. This approach has proved very positive as complaints are being processed far more quickly and less extensions are being requested. The increased effectiveness of the team has also shown a marked reduction in the numbers of complaints progressing to stage two, with complaints being resolved at an earlier stage. This also means tenants are being spared a lengthy complaints process.

There are issues with the number of complaints relating to kitchen and bathroom installations. This is a major area of concern as kitchen and bathroom replacements should be a positive experience for tenants and should not be generating the level of complaints that are currently occurring. Working extremely hard with the contractors to bring this to a better position.

The committee's discussion raised the following points:

- The Cabinet Member Housing and Customer Services explained that she had met with the Housing Ombudsman a few weeks before, and had reviewed the numbers of complaints at stage one and stage two for a range of organisations. The council's number of stage two complaints is very small in comparison to most housing providers. It is brilliant to see these complaints being resolved at stage one, whilst continuing to learn from the complaints that are being received to help resolve wider themes of dissatisfaction.
- The team were complimented for the learning framework and the positive step of embedding this into QL and other systems going forward. Will continue to drive improvements in the future as it provides a mechanism for learning where things are going wrong.
- It was noted that compliments are harder to achieve than complaints, and it was good to see these also included in the report.

## 12 Updates from the Tenant and Leaseholder Panels

**Objective:** To highlight the ongoing activities of the Tenant and Leaseholder Panels and provide an additional opportunity for tenant and leaseholder voices to be heard.

The Leaseholder representative addressed the committee and explained that the Leaseholder Forum has agreed their terms of reference. They are aiming to be more forward looking and will carry out four formal scrutinies a year. The first identified areas of focus are repairs and maintenance, service charges, major works and communications which will include updates throughout the period. They have also reviewed the housing Repairs and Maintenance policy, which has led to this being split into separate tenanted properties and leasehold policies. The latter will be reviewed by the Forum before being brought to the committee.

The committee's discussion raised the following points:

- The decision by the council to set up a separate leaseholder panel was one of the best decisions made when the governance process was decided. It was a missing loop and the feedback provided is really paying dividends from an officer perspective. Providing rich feedback that is very useful in building the



housing service. They thanked everyone who sits on the Leaseholder Forum and the Tenant Panel.

- A number of tenants have approached the Tenant Representative privately and asked him to raise their concerns about the replacement of housing benefit with Universal Credit and the position this has put tenants in. When tenants are forced to migrate the housing benefit element of Universal Credit does not pay on the due date specified in their tenancy agreement, but pays a month in arrears. This means that all migrated tenants are receiving letters telling them they are hundreds of pounds in arrears through no fault of their own. This is not just a Cheltenham problem, it is being experienced nationwide. It is particularly challenging for vulnerable tenants who are suddenly expected to make up this shortfall. This is not the fault of the housing service but is leaving them with a lot of frightened, confused and concerned tenants. It was agreed that the Chair should write to the MPs for Gloucester and Tewkesbury to request a meeting with the Minister on behalf of the committee on this matter.
- It was also confirmed that the council's Benefit and Money Advice team are continuing to support tenants with this matter and are trying to be proactive in identifying tenants who will be experiencing this problem. When tenants fall into arrears the council is required to send a letter to them but they also make contact directly and deal with the situation as sensitively and empathetically as possible. This can include looking at payment dates, agreeing an additional amount to be paid each week, or paying during rent-free weeks to make up the shortfall. Each individual or households' finances are checked before entering into any payment agreement.

### **13 Review of the Housing Committee Forward Plan**

The Forward Plan was noted.

### **14 Items to be referred to Cabinet**

The committee recommended the following policies to Cabinet:

- The Rent Setting Policy
- The Recharge Policy
- The Empty Homes (Voids) Policy
- The Repairs and Maintenance for Tenanted Properties Policy

### **15 Briefing Note - Housing Sector Insight**

**Objective:** To provide the committee with an overview of recent developments in the housing sector and provide opportunities for horizon scanning.

The briefing note was noted.

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## Cheltenham Borough Council

### Cabinet Housing Committee – 21 January 2026

### Housing Improvement Programme

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**Accountable member:**

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

**Accountable officer:**

Claire Hughes, Director of Governance, Housing and Communities

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### Executive summary

This report provides a quarterly update on the Council's Housing Improvement Programme. The programme brings together the actions required to demonstrate compliance with the Regulator of Social Housing consumer standards. This update summarises progress across the four consumer standard action plans, highlights key issues and mitigations, and sets out the forward plan for the next quarter.

Across the four action plans, there are 256 actions.

122 actions are recorded as complete (48%), including 92 complete with evidence supplied.

111 actions are in progress, and 23 actions are not started.

The programme continues to make positive progress, with a clear increase in completed and evidenced actions since December. Delivery remains focused on closing remaining actions and strengthening evidence maturity, supported by programme board oversight.

The programme remains deliverable, provided evidence completion and action plan refresh activity continues at pace.

## Recommendations

1. That the Cabinet Housing Committee notes the progress reported in this update.
2. That the Cabinet Housing Committee notes the planned areas of focus for the next quarter, particularly continued evidence completion and assurance activity.

## 1 Background

**1.1** This report provides an update to the Committee on the Council's Housing Improvement Programme.

**1.2** The Social Housing (Regulation) Act 2023 introduced strengthened consumer regulation, including new consumer standards that came into effect on 1 April 2024. From that date, the Regulator of Social Housing moved from a reactive regime focused on serious detriment to a proactive model of regulation and inspection.

**1.3** The Council is now subject to inspection by the Regulator. Following inspection, landlords receive a grading from C1 to C4, where C1 indicates full compliance and effective delivery of outcomes and C4 indicates significant failings and serious regulatory concern.

**1.4** In response, the Council established a Housing Improvement Programme led by the Director of Governance, Housing and Communities. The programme is designed to secure compliance with the consumer standards and provide assurance to Members, tenants and leaseholders, with the ambition of positioning the Council for a C1 assessment.

## 2 Governance

**2.1** The Housing Improvement Programme is overseen by the Housing Improvement Team, which operates as the programme board. The board comprises subject matter specialists, workstream leads, and the programme project manager, and meets monthly to:

- review progress against each workstream action plan
- consider risks, issues and interdependencies
- confirm alignment with the Council's digital road map, supported by the Head of Digital Development and the Programme Office

**2.2** The programme is structured around four workstreams aligned to the consumer standards:

1. Safety and Quality
2. Transparency Influence and Accountability
3. Neighbourhood and Community
4. Tenancy

**2.3** Each workstream is led by a designated officer who is accountable for:

- delivery of the workstream action plan
- maintaining a clear and consistent evidence base to support inspection readiness
- reporting progress through monthly highlight reporting to the programme board

**2.4** From January 2026, quarterly update reports will be presented to this Committee, including:

- key highlights from the previous quarter
- progress against actions expressed as a percentage
- key risks and issues

**2.5** Updates will also be provided directly to the Tenant Panel and Leaseholder Panel to support ongoing engagement and scrutiny.

### **3 Progress against the road map**

Appendix 1 summarises the current position across the four workstreams, including headline completion and progress to date. Evidence collation and validation continue to be supported through a consistent programme approach, including common standards for evidence naming, storage, and sign off.

Appendix 2 provides an overall programme status summary across all workstreams, setting out the total number of actions and completions to support effective member scrutiny.

#### **3.1 Safety and Quality**

- There are 63 actions in the Safety and Quality action plan.  
17 actions are recorded as complete, including 14 complete with evidence supplied. 38 actions are in progress, and 8 actions are not started.
- Key deliverables in progress include confirming the Category 1 and Category 2 HHSRS position, strengthening safety governance, and completing data products to support Decent Homes and stock condition reporting.

- Work is also progressing policy and process evidence that demonstrates consistent service delivery and learning from outcomes.
- A programme of work on aids and adaptations is under way, including improved recording, a reviewed register of adaptations, and clearer communications and training for staff and contractors. This work supports both service quality and tenant outcomes.
- Repairs and maintenance evidence remain in a focus area. The workstream is strengthening the audit trail for responsive repairs, voids, and planned programmes to ensure documentation demonstrates delivery, resident experience, and continuous improvement.

### **3.2 Neighborhood and Community**

- There are 48 actions in the Neighborhood and Community action plan. 24 actions are recorded as complete, including 11 complete with evidence supplied. 22 actions are in progress, and 2 actions are not started.
- Estate and estate-based activities continue to progress well, with momentum on inspection activity, local presence, and joint working with contractors. The workstream is consolidating evidence for estate inspections, service standards, and follow-up actions.
- Evidence to demonstrate delivery of cleaning and maintenance schedules has been completed and recorded.
- Work to update and evidence that the domestic abuse policy is in progress. Linked work on safeguarding and a broader wellbeing policy is scheduled later in the year, alongside continued staff awareness activity.

### **3.3 Tenancy**

- There are 56 actions in the Tenancy action plan. 27 actions are recorded as complete, including 15 complete with evidence supplied. 24 actions are in progress, and 5 actions are not started.
- Priority work continues with data and processes relating to aids and adaptations, including improved matching of adapted properties, clearer pathways for assessment and referrals, and improved recording of outcomes.
- The workstream is strengthening performance and KPI reporting so that it demonstrates tenant outcomes, including sustainment, arrears prevention, downsizing support and access to advice and support pathways.

## 3.4 Transparency Influence and Accountability

- There are 89 actions in the Transparency, Influence and Accountability action plan. 54 actions are recorded as complete, including 52 complete with evidence supplied. 27 actions are in progress, and 8 actions are not started.
- Key focus areas include maintaining and evidencing tenant engagement arrangements, ensuring information about landlord services is complete and accessible, improving performance information and reporting, and ensuring policies and communications reflect fairness, respect, and support for diverse needs. A small number of action lines are being finalised as part of the current refresh to ensure clarity of ownership and scope.

## 4 Key issues and mitigations

**Evidence of completion:** A small number of actions are recorded as complete where evidence is in the process of being uploaded or cross referenced. Each workstream maintains an evidence log and consistent folder structure, with programme oversight to support validation and closure in a consistent way.

**Data quality:** Several actions depend on reliable asset, tenancy, and engagement data. The programme continues to align dependencies with the digital roadmap and data improvement activity, including clear ownership for data validation and reporting products.

## 5 Next steps

- Continue to monitor progress of actions through the programme board
- Increase the proportion of actions complete with evidence supplied, prioritising higher risk and inspection critical areas
- Prepare for internal assurance activity and any planned external validation, including mock inspection readiness work

## 6 Key risks

See Appendix 3 for the current risk assessment and mitigations.

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**Report author:**

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**Appendices:**

- **Appendix 1:** Actuals and Expected Completion
- **Appendix 2:** Road map progress summary
- **Appendix 3:** Risk assessment



# Completion Percentage by Workstream

## Appendix: 1 Actuals and Expected Completion

Workstream	Total actions	% complete Dec 2025 (actual)	% complete Jan 2026 (actual)	Expected % complete Mar 2026	Expected % complete Apr 2026	Expected % complete May 2026
Safety and Quality	63	25%	27%	45%	60%	75%
Neighbourhood and Community	48	44%	50%	70%	85%	100%
Tenancy	56	25%	38%	60%	75%	90%
Transparency, Influence and Accountability	89	37%	61%	80%	90%	100%
Programme overall	256	33%	48%	65%	78%	90%

**Appendix 2 – Road map progress summary**

<b>Workstream</b>	<b>Total actions</b>	<b>Complete evidence supplied</b>	<b>Complete evidence to be supplied</b>	<b>In progress</b>	<b>Not started</b>	<b>Percent complete to date (January 2026)</b>
Safety and Quality	63	14	3	38	8	27%
Neighbourhood and Community	48	11	13	22	2	50%
Tenancy	56	15	12	24	5	48%
Transparency, Influence and Accountability	89	52	2	27	8	61%
<b>Total</b>	<b>256</b>	<b>92</b>	<b>30</b>	<b>111</b>	<b>23</b>	<b>48%</b>

**Notes:**

- Complete includes actions recorded as complete with evidence supplied and complete with evidence to be provided.
- In progress includes all non-complete actions that are not recorded as not started.

## Appendix 2 Risk assessment

Ref	Risk	Owner	Impact	Likelihood	Score	Response	Controls and mitigating actions	Deadline
1	Insufficient evidence of compliance with the consumer standards could result in regulatory intervention	Director of Governance Housing and Communities	4	3	12	Reduce	Workstream evidence logs are in place and are reviewed through the programme board. A consistent folder structure and evidence checklist is being applied across workstreams. Targeted support is being provided to close evidence gaps and validate inspection readiness.	Ongoing
2	Member oversight and reporting not maintained could lead to non compliance with the Transparency Influence and Accountability standard.	Director of Governance Housing and Communities	2	2	4	Accept	Quarterly reporting cycle established. Updates also provided to Tenant Panel and Leaseholder Panel.	Ongoing
3	Misalignment with the digital roadmap could result in missed dependencies and delays	Director of Governance Housing and Communities	2	2	4	Accept	Digital lead attendance at programme board. Dependencies logged and reviewed monthly.	Ongoing
4	Action plans not kept current could lead to inaccurate reporting and reduced inspection readiness	Director of Governance Housing and Communities	3	3	9	Reduce	Rebaselining exercise for overdue actions. Escalation of exceptions. Consistent progress update standard across workstreams.	February 2026

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## Cheltenham Borough Council

### Cabinet Housing Committee 21 January 2026

### Compliance Performance Data to 31 December 2025

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#### Accountable member:

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

#### Accountable officer:

Claire Hughes – Director of Governance, Housing and Communities

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#### Executive summary:

The purpose of this report is to provide the Cabinet Housing Committee with data relating to the council's compliance position as at the end of December 2025.

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#### Recommendations:

1. For committee to note the report
- 

## 1. December 2025 Compliance Data

### 1.1 Compliance report exceptions

1.1.1 **Gas servicing** - Our current compliance position for gas stands at four properties without a valid landlord's gas safety certificate.

- The court have granted an eviction for one property for lack of access; this is due on the 7<sup>th</sup> January and the gas will be capped following this.
- One property has a court hearing set for 14<sup>th</sup> January for an injunction for access.
- We are working with the TMO for access to a property and an appointment has been set for the 9<sup>th</sup> January.
- One property has now had three no access appointments and a legal pack is being drafted to apply for an injunction for access.

1.1.2 **5-year Electrical Inspection Condition Reports (EICR)** - Our current position for EICR's (5-year programme) stands at 10 overdue inspections, this is an increase of two since the last report.

- 7 properties are awaiting void works to be completed before EICR's can be completed.
- 1 disrepair case which is currently going through legal proceedings.
- 1 hoarding case which has meant the EICR cannot be completed, assistance is being provided by the Housing Team and additional alarms have been provided as mitigation in the interim.
- 1 property is awaiting certification sign off.

1.1.3 **Fire Risk Assessments** - There are sixty-two FRA's out of target.

- Forty-six were completed in December but we are awaiting FRA reports to be sent by our contractor once received these can be marked as completed.
- Sixteen are scheduled for completion by the 12<sup>th</sup> January 2026.

1.1.4 **Water Hygiene** – One risk assessment is showing as overdue; however, this has been completed, and we are awaiting certification from our contractor.

## 1.2 Additional comments

1.2.1 We currently have a total of 75 capped gas supplies.

## 1.3 Current Fire risk actions

1.3.1 There are currently 30 fire actions showing past their due date. An increase in Fire Risk Assessments being conducted have influenced this figure.

- 9 High Risk
  - 7 actions relate to electrical installations which require fire resisting enclosures – currently in discussions with National Grid. In mitigation, escape routes will be kept clear and there will be an increase in communal area monitoring. The smoke detection system will also undergo increased checks to ensure that it is kept well maintained and in working order.
  - 2 actions relate to compartmentation within communal areas and are currently with our external contractor to rectify. To mitigate the risk the smoke detection system will be well maintained and tested on a regular basis. Communal areas will also be kept clear with extra visual checks.
- 17 Medium Risk
- 3 Low Risk

All outstanding actions have been passed to internal or external contractors to rectify and are being managed by the CBC team. A weekly meeting is held to ensure that progress is being made and that contractors are held accountable performance managed for any delays.

Appropriate mitigations are in place to ensure the safety of our tenants.

#### 1.4 Legacy fire risk actions

1.4.1 Actions are now reviewed once a week.

1.4.2 **Fire Doors** – There are seven actions relating to fire doors all are with our contractor awaiting completion.

1.4.3 **Compartmentation** – Our current position is eleven actions outstanding

- **High Risk** - Works have commenced on all the high-risk compartmentation actions at Coopers Court however extra works have now been identified which has caused a delay in the completion of the project. – appropriate mitigations are in place.
- **Medium Risk** – Four sites have medium risk actions for compartmentation which will be planned in during the next year. Works have already commenced at Goldfoot House.
- **Low Risk** - There are three low risk actions, one at Coopers Court is nearing completion and works will commence on the other two later in the year.

1.4.4 **Windows**: We currently have four actions outstanding.

- All actions relate to housing blocks which have four flats per block.
- All these blocks have more 75% of their windows now installed, the remaining that are not complete are due to access issues. This amounts to four flats in total.

#### 1.5 Damp, Mould and Condensation (DMC)

The ability for Damp Mould and Condensation to negatively impact a person's health and safety is widely known. As a registered social landlord, we have had responsibilities to identify and manage DMC. With the introduction of Awaab's Law, which came into force on 27 October 2025, landlords are now faced with strict timescales for rectification works to take place.

As part of the ongoing audit, we have identified some DMC data for our current DMC management however this is not yet in a format that allows for sound reporting. Work is currently being prioritised that will allow us to management DMC performance against the new regulatory framework and to report on DMC activity as part of the monthly compliance reporting. At present timeframes cannot be put on this work however assurance is given that DMC compliance and reporting is being treated as an utmost priority with the workplan for both the Head of Regulatory Compliance and the Interim Head of Governance, Risk and Assurance.

1.5.1 Our current position shows that we have sixty-one open cases of Damp and Mould.

- Eight cases are at inspection stage in line with Awaab's Law timeframes.
- Forty-Four cases are with our trades team to rectify. These works vary from an instant mould wash / treatment, followed by anti mould paint, cavity clearance or removal from walls.
- Nine cases have been passed to external contractors which comprise of larger scales works that are required or disrepair cases.
- Cases are evaluated on a risk basis in line with Awaab's law and this will determine what mitigations are put in place.

- If a property cannot be made safe within the specified timescales tenants must be decanted.
- We currently have no tenants decanted due to damp, mould and condensation.

## **1.6 Stock Condition and Decent Homes Update**

The Regulator of Social Housing states: “Registered providers should ensure their approach to assessing and recording the conditions of their homes is robust and kept up to date by using information from a range of relevant sources such as repairs, complaints, health and safety assessments and energy performance certificate (EPC) data to maintain a rounded view of condition”.

Therefore, to assess each dwelling’s compliance with the standard, a large volume of information is required to be analysed and verified. Such as task is not feasible to be undertaken more frequently than annually.

To ensure that the Cabinet Housing Committee is kept fully informed on progress towards meeting the Decent Homes Standard for all its stock, it is proposed that two reports are presented each year. The first will be presented in July and this will provide the annual result for the Decent Homes calculation which must be submitted to the Regulator of Social Housing by 30<sup>th</sup> June.

A further report in December will provide committee members with an update on progress in tackling homes that have been identified as failing the standard. Both reports will also update on stock condition survey data and any emerging trends or issues identified from the surveys. Both reports will be detailed and provide committee members with the opportunity to influence the planned maintenance programme which seeks to maintain decency standards in all CBC Homes.



Appendix A

Compliance Scorecard - SNAPSHOT

Select the period that you would like to look at on the left-hand side filter panel.

Compliance Scorecard

	Metadata					Properties			Compliance		Non-Compliance		Performance Indicator	Properties due within 30 days
Compliance Area	Period (Year)	Period (Month)	KPI ID	Descriptor	Landlord	Total	On programme	Off Programme	In Date #	In Date %	Overdue #	Overdue %	PI	Next 30 days due total
Domestic														
KPIs (Includes leaseholder properties) - CBC/CBH														
BS01 - Proportion of Homes for which all required gas safety checks have been carried out.	2025	12	12845	KPI	CBC & CBH	4722	4418	304	4414	99.91%	4	0.09%	Non Compliant	46
BS02 - Proportion of Homes for which all required fire risk assessments have been carried out.	2025	12	12846	KPI	CBC & CBH	4722	2767	1955	2515	90.89%	252	9.11%	Non Compliant	306
BS03 - Proportion of Homes for which all required asbestos management surveys or reinspections have been carried out.	2025	12	12847	KPI	CBC & CBH	4722	2236	2486	2236	100%	0	0%	Compliant	0
Electric - EICR (5 year programme)	2025	12	12789	KPI	CBC & CBH	4722	4632	90	4622	99.78%	10	0.22%	Non Compliant	2
Electric - EICR (10 year programme)	2025	12	12541	KPI	CBC & CBH	4722	3	4719	3	100%	0	0%	Compliant	0
TSMs (Tenant Satisfaction Measures) - Excludes Leaseholders														
BS01/CBC - Proportion of Homes for which all required gas safety checks have been carried out.	2025	12	12834	TSM (BS01)	CBC	4606	4335	271	4331	99.91%	4	0.09%	Non Compliant	46
BS01/CBH - Proportion of Homes for which all required gas safety checks have been carried out.	2025	12	12837	TSM (BS01)	CBH	116	83	33	83	100%	0	0%	Compliant	
BS02/CBC - Proportion of Homes for which all required fire risk assessments have been carried out.	2025	12	12835	TSM (BS02)	CBC	4606	2738	1868	2486	90.8%	252	9.2%	Non Compliant	306
BS02/CBH - Proportion of Homes for which all required fire risk assessments have been carried out.	2025	12	12838	TSM (BS02)	CBH	116	29	87	29	100%	0	0%	Compliant	0
BS03/CBC - Proportion of Homes for which all required asbestos management surveys or reinspections have been carried out.	2025	12	12836	TSM (BS03)	CBC	4606	2236	2370	2236	100%	0	0%	Compliant	
BS03/CBH - Proportion of Homes for which all required asbestos management surveys or reinspections have been carried out.	2025	12	12839	TSM (BS03)	CBH	116	0	116	0		0		Compliant	1
BS04/CBC : TSM Percentage of Water Safety Checks Compliant CBC	2025	12	12840	TSM (BS04)	CBC	4606	406	4200	406	100%	0	0%	Compliant	0
BS04/CBH : TSM Percentage of Water Safety Checks Compliant CBH	2025	12	12841	TSM (BS04)	CBH	116	0	116	0		0		Compliant	

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Communal Blocks / Schemes														
BS01 - Proportion of Blocks for which all required gas safety checks have been carried out.	2025	12	0	BLOCK	CBC & CBH	546	13	533	13	100%	0	0%	Compliant	
BS04 - Percentage of Water Safety Checks Compliant CBC and CBH	2025	12	0	KPI	CBC & CBH	546	24	522	23	95.83%	1	4.17%	Non Compliant	0
Fire - Higher Risk Blocks	2025	12	102836	KPI	CBC & CBH	546	71	475	68	95.77%	3	4.23%	Non Compliant	
Fire - Lower Risk Blocks	2025	12	102834	KPI	CBC & CBH	546	378	168	319	84.39%	59	15.61%	Non Compliant	
Electric - EICR (5 year programme for blocks)	2025	12	0	BLOCK	CBC & CBH	546	341	205	341	100%	0	0%	Compliant	
Asbestos Surveys Communal Required	2025	12	102888	KPI	CBC & CBH	546	359	187	359	100%	0	0%	Compliant	0
Lifts	2025	12	0	BLOCK	CBC & CBH	546	313	233	313	100%	0	0%	Compliant	

Compliance Actions Scorecard SNAPSHOT

Numeric KPI Scorecard Snapshot



Actions	Period (Year)	Period (Month)	Number	In Date #	Overdue #
	2025	12	956	926	30
Fire Risk Actions - Total	2025	12	0	0	0
Fire Risk Actions - Urgent	2025	12	46	36	10
Fire Risk Actions - High	2025	12	532	515	17
Fire Risk Actions - Medium	2025	12	378	375	3
Fire Risk Actions - Low	2025	12	8	1	7
Gas Actions - Category 2 (Landlord Responsibility)	2025	12	0	0	0
Gas Actions - Gas Actions - Category 2 (Tenant Responsibility)	2025	12			

Compliance Area	Period (Year)	Period (Month)	Number of Properties	Numeric Value	Percentage
	2025	12	4722	75	1.59%
No. of properties with capped gas	2025	12	4722	971	20.56%
No. properties requiring gas safety checks in next 3 months	2025	12	5110	3865	75.64%
% up to date stock surveys	2025	12	4259	4250	99.79%
Properties that are compliant with CO alarms (%)	2025	12	4644	4629	99.68%
Properties that are compliant with smoke alarms (%)	2025	12			

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## Cheltenham Borough Council

### Cabinet Housing Committee – 21 January 2026

### KPI performance data for August - November 2025

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#### Accountable member:

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

#### Accountable officer:

Claire Hughes – Director of Governance, Housing and Communities

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#### Executive summary:

This report provides the cabinet housing committee with key performance indicator data for the period August to November 2025.

#### Recommendations:

1. For committee to note the report
- 

#### 1. Housing KPI performance data for August – November 2025

There were no significant exceptions for this month, but some data prompted additional questions to data owners.

##### 1.1 Average Time Taken to Relet Major Void – Upwards trend

In previous months, there were limited major voids ready to let, as many properties were with newly appointed void contractors. On average, CBC Void Repairs are currently taking 103 days to complete repairs on voids (both major and minor), while the Empty Homes Team took an average of 23 days to re-let properties in December.

We are now seeing an increase in major voids becoming ready to let as contractors begin returning completed properties. It is anticipated that more will follow over the next few weeks, which should enable a further reduction in overall void numbers.

### **1.2 Number of singles in Bed and Breakfast – Downwards trend**

While the figure shows a decrease of almost 50% in November, creating a striking visual in the trendline, there is no underlying structural reason for this change, as the service is demand-dependent. It should also be noted that, due to the relatively small numbers involved, minor fluctuations can appear disproportionately significant in performance reports, despite having limited impact on actual service delivery.

### **1.3 Total number of housing applications on the housing list – Upwards trend**

Applications are assessed periodically, with reviews triggered by factors such as applicants not bidding on properties or changes in personal circumstances. A higher number of assessments were carried out in October, which resulted in a significant drop in application numbers reflected in the quarterly trendline. The increase seen in November represents a natural rebound following this period of intensive application assessments.

### **1.4 Employment Initiatives caseload per month – Upwards trend**

This is another example of a visually dramatic trendline that is attributable to natural fluctuations in demand. Caseloads vary month to month, with the dip in October creating this effect as November figures returned to levels comparable with August and September. Fluctuations in caseload numbers can be driven by changes in personal circumstances, including individuals moving into training or employment, some returning to the service, some leaving altogether, and others not responding to contact.

## Appendix A

## Cabinet Housing Committee Performance Report Aug 2025 - Nov 2025

Key		Data has not been entered to allow for quarter 3 reporting
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				August 2025	September 2025	October 2025	November 2025		Trendline
Business unit	Frequency	KPI ID	KPI short desc					year to date	
Anti Social Behaviour	Monthly	10162	Number of ASB cases opened	12.00	2.00	4.00	9.00	43.00	
		10163	Number of ASB cases closed	0.00	4.00	0.00	0.00	5.00	
		10165	Number of live cases at month end	105.00	103.00	107.00	116.00	116.00	
		12871	TSM Number of new ASB cases opened that involve hate incidents per thousand properties	0.00	0.00	0.00	0.00	0.21	
		12884	TSM Number of new ASB cases opened per thousand properties	2.56	0.42	0.85	1.91	9.13	
		12824	TSM % tenants satisfied with landlord approach to handling anti-social behaviour		1.00				
	Quarterly			59.85		58.33	60.55		
	Benefit and Money Advice	Monthly	10167	Income generated on behalf of customer year to date	1,027,790.46	1,160,336.20	1,320,540.30	1,395,941.36	1,395,941.36
10190			Number of new Benefit and Money cases	40.00	62.00	82.00	85.00	476.00	
10245			Amount of Rent Arrears Cleared year to date £s	33,997.19	38,334.13	41,277.97	45,191.00	45,191.00	
Community Investment	Quarterly	12767	TSM % tenants satisfied CBH listens to their views and acts upon them		62.28		75.74	68.81	
Complaints	Monthly	11435	TSM Stage 1 complaints relative to the size of the landlord	6.39	4.46	5.74	3.82	40.56	
		12860	TSM Complaints progressing to stage 2 relative to the size of the landlord	0.43	1.06	0.43	0.42	4.46	
		12879	TSM Complaints responded to within Complaint Handling Code timescales Stage 2	100.00	100.00	100.00	100.00	95.45	
		12885	TSM Complaints responded to within Complaint Handling Code timescales Stage 1	96.55	100.00	100.00	100.00	89.94	
		Quarterly	12825	TSM % tenants satisfied with landlord approach to handling complaints		40.00		56.52	45.00
Customer Services	Monthly	12526	Total number of contact centre calls handled	3,410.00	4,029.00	3,769.00	3,656.00	30,778.00	
		12718	% Contact Centre Calls Answered within 60 seconds	82.99	87.99	90.90	84.98	89.19	
Empty Homes	Monthly	10066	Average time taken to relet minor void CBC properties (excluding FA and JDC) in days	119.00	136.82	135.80	127.72	129.80	
		10068	% Rent lost through CBC dwellings becoming vacant excluding temp furnished	2.69	2.68	2.72	2.71	2.66	
		10072	Average Time Taken to Relet Major Void and Option App CBC properties (excluding FA and JDC) in days	337.33	249.67	231.00	296.10	290.37	
		10368	Void Numbers	166.00	168.00	183.00	173.00	173.00	
		12644	Number of downsizers moved	0.00	3.00	2.00	1.00	10.00	
		Estate Services	Quarterly	12822	TSM % satisfaction of tenants with communal areas about the maintenance of the areas		76.26		
Housing Options	Monthly	10108	Number of homeless applications made	44.00	57.00	55.00	52.00	374.00	
		10114	Number of families in Bed and Breakfast	2.00	3.00	2.00	4.00	19.00	
		10123	Number of single in Bed and Breakfast	6.00	7.00	11.00	6.00	58.00	
		10131	Total number of housing applications on the housing list	2,704.00	2,734.00	2,530.00	2,579.00	2,579.00	
		10132	Number of lettings from housing list applications	26.00	39.00	38.00	44.00	245.00	
		10133	Number of people moving out of supported accommodation from the Housing List	3.00	2.00	4.00	3.00	22.00	
		11427	Average days families spent in B&B	2.50	6.33	4.50	6.25	6.42	
		11428	Average days single spent in B&B	13.00	14.43	8.00	11.50	10.62	
		12522	Number homeless applicants housed in temporary accommodation during the month	1.00	3.00	2.00	1.00	19.00	
	Quarterly	12510	Number of new housing applications added to housing list		288.00				

Housing Revenues	Monthly	10010	Current arrears as % of rental income (excluding court costs)	1.90	2.14	2.46	2.63	2.63	
		10012	Current tenant arrears level (including court costs)	493,571.77	553,896.24	632,037.45	675,638.04	675,638.04	
		10017	Current Number of Arrears	1,229.00	1,407.00	1,610.00	1,670.00	1,670.00	
		10030	Former tenant arrears amount (includes court costs)	269,732.14	273,832.27	240,986.61	245,769.29	245,769.29	
		10031	Former tenant arrears no. of cases over £10	290.00	293.00	260.00	263.00	263.00	
		10032	Former tenant arrears cash collected (includes court costs)	3,663.22	6,853.50	4,866.83	5,146.77	42,608.62	
		12938	Number of eviction warrants issued	1.00	2.00	1.00	1.00	9.00	
Housing Support	Monthly	10154	% Sheltered accommodation residents with a support plan	100.00	100.00	100.00	100.00	100.00	
		10155	% of sheltered accommodation alarm system calls answered within 3 minutes	97.18	96.89	96.48	99.11	98.18	
		12803	% HSO weekly fire tests completed	100.00	100.00	100.00	100.00	100.00	
Investment and Technical	Quarterly	12831	TSM % tenants satisfaction that the home is safe		83.26		90.83	85.67	
		12832	TSM % tenants satisfaction that the home is well maintained						
Responsive Repairs	Monthly	10046	TSM % of emergency repairs completed within target	100.00	98.97	92.42	97.70	96.68	
		10047	% of urgent repairs completed within target	93.60	91.49	92.96	95.63	94.08	
		10048	% of routine repairs completed within target	97.05	95.38	91.85	95.13	96.09	
		10049	% of programmed repairs completed within target (90 days)	98.84	100.00	98.34	97.62	98.59	
		10053	Number of out of hours calls received	0.00	0.00	0.00	0.00	0.00	
		10150	% repairs completed on first visit	82.28	83.41	82.66	85.29	80.92	
		10182	Average number of repairs per property	0.20	0.24	0.23	0.23	1.92	
		12810	TSM % of non emergency repairs completed within target	96.57	94.73	92.32	95.29	95.78	
		12896	Housemark TSM % of repairs completed within target	96.83	95.14	92.33	95.50	95.85	
		12936	Total Number of TSM Responsive Repairs	788.00	1,008.00	965.00	978.00	7,696.00	
		12937	Average TSM Responsive Repairs Time in days	6.29	6.05	9.18	6.45	6.25	
	Quarterly	12817	TSM % satisfaction with a repair in the last 12 months prior to the survey LCRA		85.62		87.77	84.58	
		12818	TSM % satisfaction with the time taken to complete repair in the last 12 months						
Tenancy Management	Monthly	12605	Adult Safeguarding - Number Referrals Made to GCC during Period	2.00	2.00	2.00	3.00	27.00	
		12665	Hoarding Cases - Number Currently Managed	0.00	0.00	0.00	0.00	0.00	
		12666	Hoarding Cases - New Cases During Period	0.00	0.00	0.00	0.00	0.00	
		12667	Hoarding - Number Cases Resolved During Period	0.00	0.00	0.00	0.00	0.00	
		12669	Adult Safeguarding - Number Referrals accepted by GCC	2.00	2.00	2.00	3.00	27.00	
		12671	Child Safeguarding - Number Referrals Made to GCC in Period	0.00	1.00	2.00	4.00	14.00	
		12778	TSM Overall tenant satisfaction (%)		80.54		84.35	81.15	
		12820	TSM % tenants feeling landlord keeps them informed about things that matter to them		79.72		86.86	83.54	
		12821	TSM % tenants feeling landlord treats them fairly and with respect		84.82		89.16	86.19	
		12823	TSM % tenants satisfied that CBH makes a positive contribution to the neighbourhood		70.70		73.63	73.97	
Training and Employment	Monthly	10176	Number of Employment Initiatives service users entering work	5.00	4.00	5.00	5.00	41.00	
		10350	Employment Initiatives caseload per month	143.00	145.00	130.00	145.00	1,077.00	



## **Cheltenham Borough Council**

### **Cabinet Housing Committee – 21 January 2026**

# **Housing Health and Safety Rating System (HHSRS) and Damp, Mould and Condensation Policy**

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#### **Accountable member:**

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

#### **Accountable officer:**

Claire Hughes, Director of Governance, Housing and Communities

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#### **Executive summary:**

This report brings forward new Housing Health and Safety Rating System (HHSRS) policy and Damp, Mould and Condensation Policy.

#### **Recommendations:**

The Cabinet Housing Committee recommends that Cabinet approves:

1. The Housing Health and Safety Rating System (HHSRS) (Appendix 2)
  2. The Damp, Mould and Condensation Policy (Appendix 5)
- 

## **1 Background**

- 1.1 Cheltenham Borough Council (CBC) provides a wide range of local services, including the provision of social housing, maintaining approximately 5,000 domestic properties, communal blocks and schemes.
- 1.2 As part of our service delivery and the provision of homes it is essential that the council has a robust policy framework in place which clearly sets out to our tenants what they can expect from the council as their landlord.
- 1.3 This report brings forward a new HHSRS policy and a new Damp, Mould and Condensation Policy. Each policy is supplemented with a tenant summary.

## **2 Housing Health and Safety Rating System (HHSRS) Policy (Appendices 2 – 4)**

- 2.1 As a landlord we are committed to meeting our legal duties to keep our homes safe by fixing disrepair and keeping them fit for human habitation and free of ‘category 1’ hazards ensuring that all our homes and communal areas managed by CBC are safe and healthy for tenants and visitors.
- 2.2 This policy outlines our approach under HHSRS to identify, assess, mitigate and eliminate hazards to ensure compliance with the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025.

## **3 Damp, Mould and Condensation (DMC) Policy (Appendices 5 – 7)**

- 3.1 We are committed to maintaining our homes to a high standard and to make sure our tenants stay safe, healthy, and well in their homes. Damp and mould are issues which can have a serious impact on the health and well-being of our tenants and cause damage to both our assets and to items stored within them.
- 3.2 This policy sets out our approach to dealing with damp and mould in our homes and communal areas. It covers the services we provide to tenants who rent their home under a tenancy agreement and those who occupy under a licence. Different properties, often of different ages, need to be looked after differently by CBC and by tenants. For leaseholders, we will meet the responsibilities as set out in the terms of the lease.

## **4 Equalities Impact Assessments**

- 4.1 Equalities impact assessments have been completed for each policy and can be found in the appendices

## **5 Key risks**

- 5.1 Key risks are set out in the risk register at Appendix 1.

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### **Report author:**

Claire Hughes, Director of Governance, Housing and Communities, [claire.hughes@cheltenham.gov.uk](mailto:claire.hughes@cheltenham.gov.uk)

### **Appendices:**

1. Risk Assessment
2. HHSRS Policy
3. HHSRS Policy Summary for Tenants
4. HHSRS Policy Equality Impact Assessment
5. The DMC Policy
6. The DMC Policy Summary for Tenants
7. The DMC Policy Equality Impact Assessment

## Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
1	The Council has a legal duty to ensure that properties it manages are safe and comply with all applicable statutory requirements. If the Council fails to adopt clear policies then this could result in ambiguity potentially putting tenants and residents at risk	Director of Governance, Housing and Communities	5	3	15	Reduce	Produce, approve and implement clear and robust policies and associated procedures.	Director of Governance, Housing and Communities	February 2026
2	If the Council does not have clear policies in place or does not comply with the provisions of the policies then there is a risk that the council could be subject to legal and/ or financial risk.	Director of Governance, Housing and Communities	5	3	15	Reduce	Produce, approve and implement clear and robust policies and associated procedures.	Director of Governance, Housing and Communities	February 2026

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# Cheltenham Borough Council

## Housing Health and Safety Rating System (HHSRS) Policy

### Version control

**Document name:** Housing Health and Safety Rating System (HHSRS) Policy

Version: 1.0

Responsible officer

- Director of Governance, Housing and Communities

Approved by: Cabinet

Next review date: January 2029

Retention period: 6 months after approval of new policy

### Revision history

Revision date	Version	Description
January 2026	1	New policy

### Consultees

#### Internal

- Housing service managers

#### External

- None

### Distribution

All housing staff

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## 1. Introduction

- 1.1 Phase 1 of Awaab's Law came into force for the social rented sector on **27 October 2025**, which requires all social landlords to address **all emergency hazards, all damp and mould** and **all significant hazards** present risk of harm to tenants to fixed timeframes.
- 1.2 In 2026 the regulations will be extended to include the following hazards where they present a significant risk of harm:
  - excess cold and excess heat
  - falls associated with baths etc., on level surfaces, on stairs and between levels
  - structural collapse, and explosions
  - fire, and electrical hazards
  - domestic and personal hygiene and food safety
- 1.3 In 2027, the regulations will be further extended to all remaining HHSRS hazards (apart from overcrowding) where they present a significant risk of harm.
- 1.4 CBC will prepare for the future expansion of Awaab's Law. This guidance includes information in relation to damp and mould hazards that will be in scope for the first phase of Awaab's Law and will be updated to include other hazards ahead of the coming into force of further phases. We want to make sure that this policy works

effectively through taking a 'test and learn' approach and will implement any lessons learned between phases.

- 1.5 The phased approach does not mean that CBC have leeway on addressing dangerous issues in our homes in the meantime and therefore we must continue to meet our legal duties to keep homes safe by fixing disrepair, and keeping our homes fit for human habitation and free of dangerous 'category 1' health or safety hazards. We will also continue to meet the outcomes set out by the Regulator of Social Housing in its Safety and Quality standard.

## 2. Context

- 2.1 The Regulations are also known as 'Awaab's Law' in memory of 2-year-old Awaab Ishak, who died tragically in 2020 as a result of a severe respiratory condition due to prolonged exposure to mould in his home. Awaab's parents had complained repeatedly to their social landlord in the three years prior to Awaab's death, but no action was taken by their social landlord to treat the mould.
- 2.2 Living in hazardous conditions can have a substantial impact on people's health, safety and wellbeing. While many landlords take timely and effective action to address hazards, Awaab's Law serves as a legal backstop for the cases where social landlords are failing to make repairs quickly enough, leaving their tenants at risk.
- 2.3 The primary legislation for Awaab's Law was first introduced through the [Social Housing \(Regulation\) Act 2023](#), and inserts (or in legal terms 'implies') into social housing tenancy agreements a term that requires social landlords to comply with the requirements that are set out in these Regulations. This means all social landlords have to meet the requirements in the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025. If they do not, tenants can hold their social landlords to account by taking legal action through the courts for a breach of contract. Other avenues of redress are available to tenants via the social landlord's complaints procedure and the Housing Ombudsman Service.

## 3. Policy Statement

- 3.1 CBC is committed to meeting its legal duties to keep our homes safe by fixing disrepair and keeping them fit for human habitation and free of 'category 1' hazards ensuring that all our homes and communal areas managed by CBC Housing Services are safe and healthy for tenants and visitors. This policy outlines our approach under HHSRS to identify, assess, mitigate and eliminate hazards.
- 3.2 CBC will comply with relevant legislation and guidance, including:
- Health and Safety at Work etc Act 1974
  - Housing Act 2024.
  - Defective Premises Act 1972.
  - Landlord and Tenant Act 1985.
  - Homes (Fitness for Human Habitation) Act 2018.
  - Decent Homes Standard 2006.
  - Consumer Regulations 2024 – Regulator for Social Housing.
  - Pre-Action Protocol for Housing Conditions Claims (England), 2021.
  - Social Housing (Regulation) Act 2023.
  - Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025.

## 4. Scope

- 4.1 This policy applies to all properties and communal areas managed by CBC – Housing Services where we hold responsibility for repairs and maintenance.
- 4.2 This policy does not apply to:
- Leasehold properties
  - Any other dwelling/building managed by CBC which are not otherwise included in the property portfolio of Housing Services
  - Hazards resulting from a breach of tenancy agreement by the resident, including deliberate damage or unauthorised alterations.
  - Hazards which are ‘non-significant’ hazards otherwise known as Category 3 or 4 hazards.
- 4.3 Leaseholders and shared owners are responsible for repairs within their demised premises, as outlined in their lease agreements. If the issues arise within the communal area or involves a structural building defect, CBC is responsible for carrying out the repairs in line with the terms of the relevant lease agreement.
- 4.4 Hazards that pose a significant risk to the health or safety of our tenants within the affected home fall within scope of Awaab’s Law. CBC is responsible for determining whether a hazard poses a significant risk to a customer(s) health or safety.
- 4.5 This policy has been developed to ensure full compliance with all HHSRS hazards falling within the scope of Awaab’s Law, including those introduced through its phased implementation from 27 October 2025 onwards.

## 5. Definitions

Term	Definition
Housing Health and Safety Rating System (HHSRS)	The risk-based evaluation tool used to assess potential hazards in residential properties, as defined under the Housing Act 2004
Emergency Hazard (Category 1)	An emergency hazard otherwise known as <b>Category 1 hazards</b> are those that poses ‘an imminent and significant risk of harm’ to the health or safety of the tenant.
Significant Hazard (Category 2)	A ‘significant hazard’ otherwise known as Category 2 hazards are those that poses a ‘significant risk of harm’ to the health or safety of a tenant. A ‘significant risk of harm’ is defined as ‘a risk of harm to the occupier’s health or safety that a reasonable lessor with the relevant knowledge would take steps to make safe as a matter of urgency’.
Non-Significant Risk (Category 3 and 4)	A ‘non-significant’ otherwise known as Category 3 or 4 hazards are those that do not pose a serious threat to health or safety and would not require urgent action by a reasonable social landlord. These hazards are outside the scope of this policy



## 6. Groups, 29 Hazards and Vulnerabilities

- 6.1 A potential source of harm or adverse health effect on a person.  
Under HHSRS there are currently 29 hazards of which the most common are damp and mould, excess cold, falls and fire safety. These fall into 4 Groups A – D

Groups	Hazards	Vulnerabilities	Responsible Team/Department
a	b	c	d
<b>Group - A</b> Physiological Requirements	1. Damp and mould growth	14yrs of less	Repairs - DMC
	2. Excess cold	65yrs plus	T&I Compliance
	3. Excess heat	65yrs plus	T&I Compliance
	4. Asbestos and manufactured mineral fibres)	No specific group	T&I Compliance
	5. Biocides	No specific group	T&I Compliance
	6. Carbon monoxide and combustible products	CO, 65yrs plus NO <sub>2</sub> SO <sub>2</sub> and smoke – No specific group	T&I Compliance
	7. Lead	Under 3yrs	T&I Compliance
	8. Radiation	All persons aged between 60-64 who have had lifetime exposure to radon	T&I Compliance
	9. Un-combusted fuel gas	No specific group	T&I Compliance
	10. Volatile organic compounds	No specific group	T&I Compliance
<b>Group - B</b> Physiological Requirements	11. Crowding and space	No specific group	TMO
	12. Entry by intruders	No specific group	Customer Services
	13. Lighting	No specific group	Customer Services
	14. Noise	No specific group	?
<b>Group - C</b> Protection Against Infection	15. Domestic hygiene, pests and refuse	No specific group	TMO
	16. Food safety	No specific group	TMO
	17. Personal hygiene sanitation and drainage	Under 5yrs	TMO – Personal Hygiene Customer Services - Drainage
	18. Water supply	No specific group	Repairs
<b>Group - D</b> Protection Against Accidents	19. Falls associated with baths etc	60yrs plus	Repairs
	20. Falling on level surfaces etc	60yrs plus	Repairs
	21. Falling on stairs	60yrs plus	Repairs
	22. Falling between levels	Under 5yrs	Repairs
	23. Electrical hazards	No specific group	Electrical
	24. Fire	No specific group	Repairs
	25. Flames, hot surfaces and materials	No specific group	TMO
	26. Collision and entrapment	No specific group	TMO
	27. Explosions	No specific group	Repairs
	28. Ergonomics	No specific group	Repairs
	29. Structural collapse and falling elements	No specific group	Repairs

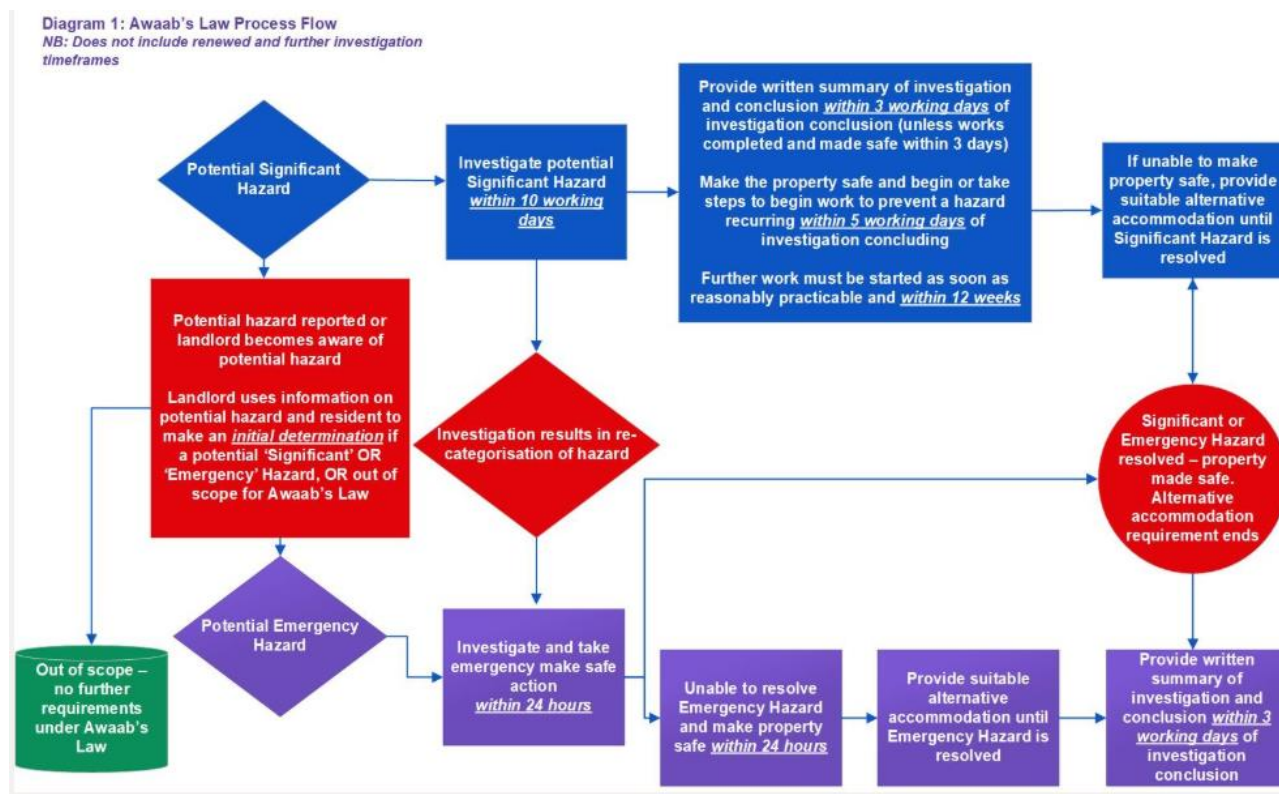
## 7. Emergency Hazards (category 1)

- 7.1 **Step 1 – (Day Zero)** A potential emergency hazard is reported, or a CBC colleague or contractor identifies a potential emergency hazard during a property visit.
- Immediately inform either the duty supervisor on **07786 640 814** or Building Services Logistics team on **01242 387 639**
  - Building Services Logistics Team assigns the case to a supervisor or T&I surveyor
  - The assigned supervisor/surveyor then reviews all available information about the hazard and the resident's circumstances. Based on this, they make an initial assessment to decide whether the issue is a potential 'emergency hazard' or if it needs to be downgraded to a 'significant' hazard or if it falls outside the scope of Awaab's Law.
  - The supervisor/surveyor must further investigate and visit the property if after reviewing all available information concludes the presence of a potential emergency hazard. If the investigation confirms an emergency hazard at the property, then the supervisor/surveyor must arrange for the relevant safety work to be undertaken as soon as reasonably practicable. The investigation and the work must both take place within **24 hours** of becoming aware of the hazard.

## 8. Significant Hazards (category 2)

- 8.1 **Step 1 – (Day Zero)** A potential significant hazard is reported, or a CBC colleague or contractor identifies a potential significant hazard during a property visit.
- Immediately inform either the duty supervisor on **07786 640 814** or Building Services Logistics team on **01242 387 639**
  - Building Services Logistics Team assigns the case to a supervisor or T&I surveyor
  - The assigned supervisor/surveyor then reviews all available information about the hazard and the resident's circumstances. Based on this, they make an initial assessment to decide whether the issue is a potential 'significant' or needs upgrading to an 'emergency' hazard, or if it falls outside the scope of Awaab's Law.
- 8.2 **Step 2** - If a potential significant hazard is identified, the assigned supervisor/surveyor must carry out an investigation within **10 working days**. If their investigation confirms a significant hazard, they must:
- Provide a written summary of the investigation and its findings to the resident within **3 working days** of the conclusion (unless the property is made safe and works are completed within 3 working days)
  - Complete relevant safety works and begins or take steps to begin any further supplementary works to prevent the hazard from reoccurring within **5 working days** of concluding the investigation
  - Where further supplementary works are required and it is not possible to begin them within 5 working days, then CBC must start these as soon as reasonably practicable and **within 12 weeks** of the investigating concluding

8.3 This diagram shows a simplified process to support understanding of Awaab's Law timeframes resolving a significant or emergency hazards, full details of which can be found within the guidance.



## 8.4 Renewed Investigations

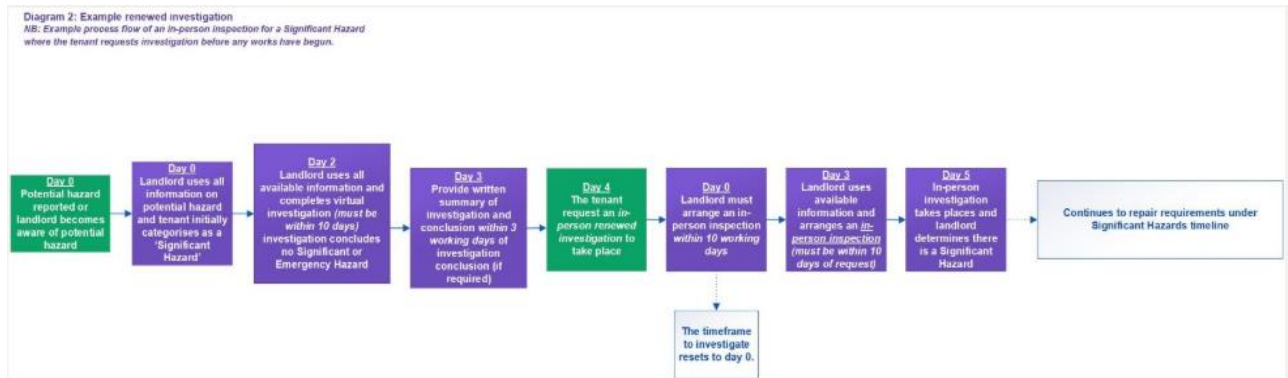
8.4.1 If a tenant specifically requests an in-person inspection after an investigation has been done remotely, a 'renewed' in-person investigation must be carried out. For potential significant hazards, the renewed investigation must be completed **within 10 working days** of the request, so the timeline for investigation is effectively reset.

8.4.2 This must confirm whether or not there is a significant or emergency hazard and must also, if possible, identify the required work to make a property safe and prevent the hazard from recurring.

8.4.3 Tenants should therefore be encouraged to request an in-person inspection in the first instance if they believe one is required. For potential emergency hazards, the tenant may request an in-person investigation **within 10 working days** if an initial remote investigation concludes there is not an emergency hazard or if the initial investigation finds an emergency hazard but does not identify any relevant safety work to address the emergency hazard.

8.4.4 Under Awaab's Law, CBC are not required to undertake a renewed investigation if required works to prevent the hazard from recurring have already begun, or if relevant safety work under regulation 5 (emergency action) or a further investigation (under regulation 8) is required. However, in a case where a further investigation is required CBC will conduct an in-person inspection under the provision relating to further investigations, if the tenant so requests.

8.4.5 The process flow shows a hypothetical scenario and simplistic example of a renewed investigation. This example is not reflective of all possible circumstances and should not be relied upon exclusively for understanding the requirements.



## 9. Decants (required moves)

### 9.1 Securing Suitable Alternative Accommodation

9.1.1 If we are unable to complete the relevant safety work within the initial remediation period (5 working days from the completion of the investigation that identified the hazard for a significant hazard or 24 hours for an emergency hazard), then arrangements will be made to secure the provision of suitable alternative accommodation, until the relevant safety work has been completed.

9.1.2 The provision of suitable alternative accommodation will extend to anybody who usually lives in the property as a member of the tenant's family and in accordance with the tenancy agreement, including children who would usually stay in the property overnight for at least one night a week.

9.1.3 The ultimate decision as to whether to leave their home and move into alternative accommodation sits with the tenant.

### 9.2 Tenant Refusing Alternative Accommodation

9.2.1 If the tenant refuses the offer of suitable alternative accommodation and chooses to make their own arrangements, then they **must inform us in writing**.

9.2.2 It should be noted that raising concerns that a property is unsuitable is not the same as refusing an offer of any alternative accommodation. Should the tenant refuse alternative accommodation as an option, it should be made clear to them that CBC is not required to provide further offers of suitable accommodation. However, where a tenant has previously refused an offer of alternative accommodation, CBC will also consider their wider duties, procedures and policies to keep tenants safe.

### 9.3 Remaining in the Property

9.3.1 If anyone chooses to remain in the property in the period before the relevant safety work is completed (for example if an alternative accommodation offer is declined, or if only part of the household move out), then we must provide information on any actions that occupants could take or avoid to mitigate the risk of harm, or let the tenant know if they do not think it is possible for the occupant to do anything to mitigate that risk.

### 9.4 Returning to the Home

- 9.4.1 Tenants can choose to end the provision of alternative accommodation and return to their home at any time and in doing so the tenant must inform us in **writing**, resulting in the provisions of the already provided alternative accommodation being brought to an end.

## 10. GDPR

- 10.1 Information about tenants is personal data and may be sensitive. GDPR informed consent requires individuals to be fully aware of how their data will be used and to have the power to control their data by freely agreeing, specifically, and unequivocally to the processing. In recording and handling this data, we must ensure that we comply with UK General Data Protection Regulation UK (GDPR) and the Data Protection Act 2018, noting that GDPR places special restrictions on the collection and recording of health data.

## 11. Defence

### 11.1 Reasonable Endeavours

- 11.1.1 CBC have a defence for a failure to comply with Awaab's Law requirements if we can prove that we have used all reasonable endeavours to avoid it, meaning we have taken all reasonable steps to comply with the requirements of the Awaab's Law, but it has not been possible for reasons genuinely beyond our control. Examples could include:
- Unable to complete work within the timeframes because asbestos removal which would otherwise require a 14-day notification. Likewise, other approvals and permissions might be needed from external bodies, which requires CBC to evidence that appropriate steps to obtain these in good time are being carried out.
  - Tenant refusing access to the property to enable CBC to complete relevant safety works within the specified timeframes.
  - Unable to source specialist contractors or materials within the required timeframes but has made reasonable efforts to do so.
  - CBC have made reasonable efforts to secure suitable alternative accommodation, but there may be no suitable properties which are within a reasonable distance of schools/places of work or in the local area. In this case CBC will work with the tenant to identify the best option.
  - The tenant no longer wishes to remain in the alternative accommodation, and the tenant gives CBC notice of this in writing.

## 12. Stock Condition Surveys

- 12.1 Stock condition survey will be carried out at 5 yearly intervals. If during a stock condition survey, the surveyor identifies a Category 1 or 2 hazard then they must report it immediately to either the duty supervisor on 07786 640 814 or logistics on 01242 387 639

## 13. Post Inspections

- 13.1 All remedial works relating to Category 1 or 2 hazards will be post inspected to ensure that the hazard(s) have been mitigated and the remedial works has been completed to a satisfactory standard.
- 13.2 Under Awabb's Law, there is no requirement to contact tenants post completion of remedial works. However, CBC will periodically contact the tenant after completion of the works to ensure the hazard has not returned at the following intervals:

- 14 days after completion of remedial works
- 2 months after completion of remedial works
- 12 months after completion of remedial works

13.3 If the tenant is unwilling or unable to provide access within the above timescales, CBC will not be in breach for missing the timescales and will not record this as a failure. However, we will continue to work with the tenant and arrange access so that we can establish if the remedial works has mitigated the hazard or further works is required.

## 14. Record Keeping

Records relating to the case must be maintained such as:

- Correspondance to and from the tenant
- Correspondance to and from contractors
- Investigation reports
- Completion records/certificates
- Any other record which might otherwise be relevant to the case.

## 15. Training

15.1 Mandatory HHSRS training requirements for all property visiting colleagues:

Role	Course Type	Delivery Method
T&I Managers & Surveyors	Enhanced	Virtual or in-person
Building Services Managers & Supervisors	Enhanced	Virtual or in-person
Building Services Tradesmen	Condensed	In-person
Health & Safety Manager	Condensed	Virtual or in-person
TMOs, ASB, Empty Homes, Income & any other property visiting teams	Condensed	Virtual or in-person

15.2 Training is to be repeated at 3 yearly intervals with records maintained in T100.

## 16. Responsibility and Decision Making

16.1 The table below illustrates the structure for responsibility and decision-making in relation to this policy.

Person Responsible	Scope
Director of Housing	<ul style="list-style-type: none"> <li>• Responsible for the implementation, day-to-day application and adherence to this Policy and Procedure.</li> </ul>
Director of Governance, Housing and Communities	<ul style="list-style-type: none"> <li>• Policy owner.</li> </ul>
Operations Manager Technical and Investment	<ul style="list-style-type: none"> <li>• Ensure that all properties meet the Decent Homes Standard</li> <li>• Ensure all Stock Condition Surveys (SCS) on the 5-year programme include a suitable &amp; sufficient HHSRS assessment.</li> <li>• To ensure HHSRS CAT 1 or CAT 2 actions identified during a SCS are logged correctly and actioned by the relevant teams</li> </ul>
Tenancy Team Leader/ Repairs Manager	<ul style="list-style-type: none"> <li>• Review and action any HHSRS reports, ensuring that they are actioned within the specified timeframes</li> </ul>

Health & Safety Manager	• Record monthly on the compliance report any recorded CAT 1 or CAT 2 cases.
All frontline staff including CBC contractors	• Identification and reporting of hazards identified during any visit to our homes.

## 17. Associated policies and procedures

### 17.1 Associated Policies and Procedures

- CEOs Health and Safety Policy Statement
- Repairs & Maintenance Policy
- Damp, Mould & Condensation Policy
- Asbestos Policy
- Electrical Safety Policy
- Fire Safety Policy
- Gas and Heating Policy
- Lift Safety Policy
- Water Hygiene Policy
- Asset Management Strategy
- Complaints Policy
- No Access Procedure

## 18. Review

- 18.1 This policy will be reviewed within **six months** of its initial implementation. Subsequent reviews will occur every **three years**, or earlier if prompted by changes in legislation, operational requirements, or any other relevant circumstances.
- 18.2 The Director of Governance, Housing and Communities is responsible for leading on the reviewing of this policy, which must include all Responsible Persons listed in the table at 16.1 with exception of frontline staff and contractors.

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## Tenant Summary: Housing Health and Safety Rating System (HHSRS)

### Why this matters

We want to keep your home safe and healthy. Awaab's Law means hazards must be fixed quickly to protect you and your family.

### What hazards are covered?

- Damp and mould
- Excess cold or heat
- Fire and electrical hazards
- Falls (stairs, baths, etc.)
- Structural collapse
- Hygiene and food safety issues

### What we will do

- Emergency hazards: Investigated and made safe within 24 hours
- Significant hazards: Investigated within 10 working days, safety work started within 5 working days, full repairs within 12 weeks

### Your rights

- Request an in-person inspection if the first check was remote
- Alternative accommodation offered if repairs cannot be completed quickly
- If you refuse alternative accommodation, confirm in writing

### What we need from you

- Report hazards promptly
- Allow access for inspections and repairs
- Tell us in writing if you refuse alternative accommodation or decide to return home

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## Introduction

An Equality Impact Assessment (EqIA) is a method for assessing the effects or impacts of a council policy or function on removing barriers to equality.

The Equality Act 2010 includes a public sector equality duty which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made.

Examples of when an EqIA should be completed are:

<ul style="list-style-type: none"><li>Any proposals to introduce or add to a service</li></ul>	<ul style="list-style-type: none"><li>Any proposals to adopt policy priorities, strategies and plans</li></ul>
<ul style="list-style-type: none"><li>Any proposals to remove, reduce or alter a service</li></ul>	<ul style="list-style-type: none"><li>Changes to staffing structure where groups of employees are likely to be negatively affected</li></ul>
<ul style="list-style-type: none"><li>Any new policies or changes to policies</li></ul>	<ul style="list-style-type: none"><li>Any proposals in relation to procured or commissioned services</li></ul>

## Stage 1 - Equality Screening

Whenever a policy/service or function is reviewed, changed, developed or removed an initial equality impact assessment stage 1 will need to be undertaken. This is a screening template and will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy development.

## Stage 2 – Equality Impact Assessment

This is the full EqIA and seeks to identify the equality considerations that have been taken into account including any mitigating actions proposed and ensures decisions are based on evidence. The EqIA will need to be agreed with the appropriate Head of Service or Director and should be included on the decision making report, along with commentary on the assessment in the main body of the report.

**1. Identify the policy, project, function or service change**

**a. Person responsible for this EqIA**

Officer responsible: Claire Hughes	Service Area: Housing Services
Title: Director of Governance, Housing and Communities	Date of assessment: 06/01/2026
Signature: <i>Claire Hughes</i>	

**b. Is this a policy, function, strategy, service change or project?**

Policy

If other, please specify:

**c. Name of the policy, function, strategy, service change or project**

Housing Health and Safety Rating System (HHSRS) Policy

Is this new or existing? **New or proposed**

**Please specify reason for change or development of policy, function, strategy, service change or project**

The policy has been developed to demonstrate how the Council will comply with the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025

**d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?**

Aims:	The aim of this policy is to ensure that the Council's process for complying with Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 is clearly set out.
Objectives:	<p>The policy will:</p> <ul style="list-style-type: none"> <li>Set out how the council will ensure compliance with the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025</li> </ul>
Outcomes:	Tenants and staff will be aware of the processes followed by the council to ensure compliance with the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025
Benefits:	<p>This policy should offer assurance to tenants that the council is meeting its legal obligations and is committed to dealing with hazards effectively.</p> <p>Employees of the Council can utilise this policy to ensure correct processes are utilised.</p>

**e. What are the expected impacts?**

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.

**No**

Do you expect the impacts to be positive or negative?

**No impact expected**

Please provide an explanation for your answer:

This policy is equally applicable to all tenants.

**If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.**

**f. Identify next steps as appropriate**

Stage Two required

**No**

Owner of Stage Two assessment

Completion date for Stage Two assessment

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<b>Name</b>	Damp and Mould Policy
<b>Owner</b>	Head of Regulatory Compliance
<b>Last Review</b>	TBC
<b>Next Review</b>	TBC
<b>Tenant Consultation</b>	TBC
<b>Equality Impact Assessment</b>	TBC
<b>Board Approval</b>	TBC

**Strategic Lead**

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**Sign**

---

**Date**

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**Chair of Board**

---

**Sign**

---

**Date**

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## 1.0 Introduction and Objectives

- 1.1 Cheltenham Borough Council (CBC) is committed to maintaining our homes to a high standard and to make sure our tenants stay safe, healthy, and well in their homes. Damp and mould are issues which can have a serious impact on the health and well-being of our tenants and cause damage to both our assets and to items stored within them.
- 1.2 This policy sets out our approach to dealing with damp and mould in our homes and communal areas. It covers the services we provide to tenants who rent their home under a tenancy agreement and those who occupy under a licence. Different properties, often of different ages, need to be looked after differently by CBC and by tenants. For leaseholders, we will meet the responsibilities as set out in the terms of the lease.

## 2.0 Scope

- 2.1 Awaab's Law is the common name for the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025, of which phase one came into force on 27<sup>th</sup> October 2025. The legislation includes fundamental changes to remediate damp, mould and emergency hazards within rigorous timescales. While Awaab's law will be implemented in a phased approach, landlords must take all reasonable steps to comply with the new legal requirements from the outset.
- 2.2 This policy takes account of the recommendations made in the October 2021 Housing Ombudsman Spotlight Report on Damp and Mould: It's not Lifestyle, and the subsequent follow up report in February 2023.
- 2.3 This policy outlines CBC's approach to damp and mould including proactive and reactive investigations, planning of resources in anticipation of periods of higher demand, budget management to reduce instances of damp and mould, ensuring staff have the correct competence and equipment to assess cases, and our tenant engagement and complaints procedures.
- 2.4 Damp and mould create risks to health due to increased prevalence of house dust mites and mould or fungal growths resulting from dampness and/or high humidities. The government's guidance on the Housing, Health, and Safety Rating System states that the hazard of damp and mould includes threats to mental health and social well-being which may be caused by living with the presence of damp, damp staining and/or mould growth.
- 2.5 Mould is a type of fungus. It spreads through spores, which are invisible to the naked eye but are in the air around us all the time and can quickly grow on surfaces where dampness persists, or water has formed into a visible covering.

- 2.6 There are four main causes of dampness in homes. It is important to determine the cause of damp within a property as the remedial works required will require differing solutions:
- 2.7 **Water leaks** from defective supply and waste pipework (especially in bathrooms and kitchens) can affect both external and internal walls and ceilings. The affected area looks and feels damp to the touch and stays damp regardless of the prevailing weather conditions. It is the result of a problem or fault with the home or building, which requires repair.
- 2.8 **Rising damp** is caused by water rising from the ground into the home or building. Water gets through or around a defective damp proof course (DPC) or passes through the masonry that was built without a DPC. Rising damp will only affect basements and ground floor rooms. It will be present all year round but can be more noticeable in winter. It is generally the result of a problem or fault with the property, which requires repair.
- 2.9 **Penetrating damp** appears because of a defect in the structure of the home or building, such as damaged brickwork, missing roof tiles, loose flashing or leaking rainwater goods. These defects allow water to pass from the outside to the floors, walls, or ceilings. Penetrating damp is far more noticeable following a period of rainfall and will normally appear as a well-defined 'damp-patch' which looks and feels damp to the touch. It is the result of a problem or fault with the home, which requires a repair.
- 2.10 **Condensation** is a common cause of dampness and is caused by excessive moisture in the air (water vapour) inside the dwelling meeting a colder surface, such as a window or wall. The drop in temperature causes liquid water to form on the surface and then soak in. It is usually found in kitchens, bathrooms, the corners of rooms, on north facing walls and on or near windows, all places that either tend to have a lot of moisture in the air, or to be cold generally. It is also found in areas of low air circulation such as behind wardrobes and beds, especially when they are pushed up against external walls.
- 2.11 All homes in England can be affected by condensation because the climate is often cool and wet. Normal household activities also constantly release moisture into the air. Good practice in the home minimises and alleviates condensation, and in many cases will prevent it causing dampness and persistent mould. However, the root cause can be a problem that requires a CBC repair or an improvement to the home or property. In others, a different solution may be needed (for example, in cases of severe overcrowding).
- 2.12 Where CBC finds or is made aware of damp issues within our properties, the initial response will be to resolve the defect to prevent exposing tenants or others to health associated risks. Where a third party is involved, we will work collaboratively to ensure the issue is remediated quickly. If the defect is not deemed to be the responsibility of CBC we will seek to recover costs in line with our rechargeable repairs policy.

### 3.0 Roles and Responsibilities

- 3.1 The Cabinet has overall governance responsibility for ensuring this policy is fully implemented to ensure full compliance with legislation, regulatory standards and the requirements of other stakeholders such as the Housing Ombudsman Service. As such, the Cabinet will formally approve this policy and review it every two years (or sooner if there is a change in legislation or regulation).
- 3.2 For assurance that this policy is operating effectively in practice, the Compliance Monitoring Group will receive regular updates on its implementation, operational performance and any non-compliance. They will also be notified of any non-compliance issue identified.
- 3.3 The Housing Cabinet Committee (HCC) will receive quarterly performance reports in respect of damp and mould and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.4 The **Head of Regulatory Compliance** has strategic responsibility for the management of damp and mould, and ensuring compliance is achieved and maintained. They will oversee the implementation of this policy.
- 3.5 The Compliance Team has operational responsibility for the management of damp and mould cases and will be responsible for overseeing the delivery of remedial programmes.
- 3.6 The Tenancy Management Team will provide support where gaining access to properties is difficult and will assist and facilitate any legal or controlled access processes as necessary.

### 4.0 Legislation, Guidance and Regulatory Standards

#### 4.1 **Legislation** - The principal legislation applicable to this policy is:

- The Housing Act 2004
- The Landlord and Tenant Act 1985 as amended by The Home (Fitness for Human Habitation) Act 2018
- The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (also known as Awaab's Law)

This policy also operates within the context of additional legislation (see Appendix 1).

#### 4.2 **Guidance** – The principal guidance applicable to this policy is:

- The Decent Homes Standard and the Housing Health and Safety Rating System (HHSRS) guidance
- Housing Ombudsman Spotlight on Damp and Mould: It's not lifestyle. October 2021 and February 2023 update.

- Awaab’s Law: Guidance for Social Landlords – October 2025

4.3 **Regulatory standards** – We must ensure we comply with the Regulator of Social Housing’s regulatory framework and consumer standards for social housing in England; the Safety and Quality Standard is the primary one applicable to this policy. The Social Housing (Regulation) Act 2023 also brought changes to the way social housing is regulated.

4.4 **Sanctions** – Failure to discharge our responsibilities and obligations properly could lead to sanctions, including prosecution by the relevant local authority under the Housing Act 2004, the Health and Safety Executive (the HSE) under the Health and Safety at Work Act 1974; prosecution under the Corporate Manslaughter and Corporate Homicide Act 2007; via determinations from the Housing Ombudsman and via a regulatory notice from the Regulator of Social Housing.

## 5.0 **Obligations**

5.1 The Housing Act 2004 requires that properties must be free from Category 1 HHSRS hazards, including damp and mould, and excess cold. Category 1 hazards (band A-C) mean a property does not meet the legal minimum standard for housing condition, and action must be taken to reduce the risk to that which would be expected of a property of that age and type. The government has directed local authorities in November 2022 to also have regard to ‘high scoring Category 2 hazards (band D and E) for damp and mould when considering enforcement action.

5.2 The Landlord and Tenant Act 1985 as amended by the Homes (Fitness for Human Habitation) Act 2018 requires that properties must be fit for human habitation, including being free of dampness prejudicial to the health of occupants, and category 1 HHSRS hazards.

5.3 The Decent Homes Standard was updated in 2006 to take account of the Housing Health and Safety Rating System (HHSRS). According to the Standard, for a home to be considered ‘decent’ it must:

- Meet the current statutory minimum standard for housing (Be free of Category 1 HHSRS Hazards).
- Be in a reasonable state of repair.
- Have reasonably modern facilities and services.
- Provide a reasonable degree of thermal comfort.

5.4 The Social Housing (Regulation) Act 2023 allowed for the introduction of The Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 (also known as Awaab’s Law). Phase one of these requirements came into force 27th October 2025 and landlords must:

- Investigate any potential emergency hazards and, if the investigation confirms emergency hazards, undertake relevant safety work as soon as reasonably

practicable. The investigation and the work must both take place within **24 hours** of becoming aware of the hazard.

- Investigate potentially significant cases of damp and mould within ten working days of being made aware of them.
- Provide and issue a report summarising the investigation to tenants within three working days of the investigation's completion.
- Complete and safety work within five working days of the investigation concluding.
- Begin any further repair work within five working days of the investigation concluding.
- Complete any further work within a reasonable period, but no longer than 12 weeks
- Maintain adequate record keeping throughout the repair works.
- If the investigation identifies a significant or emergency hazard. If steps cannot be taken to begin further work in **5 working days** this must be done as soon as possible, and work must be physically started **within 12 weeks**.
- Inform tenants of their rights, including how to make compliant and what they should expect under the HHSRS.
- Trigger a decant process, if the proposed timeframes under Awaab's Law cannot be met.

## 6.0 Statement of Intent

- 6.1 We will take a zero-tolerance approach to damp and mould and provide dry, warm, healthy, and safe homes for our tenants which are free from any serious hazards.
- 6.2 We will enhance our understanding of our assets in relation to damp and mould and have proactive programmes for managing this issue. This will include analysis of stock condition data, our tenants, and complaint levels to drive a data and risk-based approach.
- 6.3 We will undertake all steps to comply with Awaab's Law, adopting a person-centred approach to dealing with damp and mould cases within the prescribed time frames. We will adjust the measures in place and the principles within this policy, in accordance with the phased introduction of Awaab's Law.
- 6.4 We will take a proactive approach to monitoring the condition, safety and compliance of our homes. We will aim to undertake inspections across our housing stock on at least an annual basis, taking all reasonable steps to gain access, to ensure properties remain safe, compliant and in a good state of repair. This approach will include a range of planned and responsive activities, such as repairs, stock condition and energy performance assessments, inspections of void and long-term empty properties, checks of heating and hot water systems, and fire safety inspections, including fire doors, as appropriate.

- 6.5 We will proactively maintain and repair the building fabric to prevent deterioration that may cause or exacerbate damp, including timely action on leaks, structural defects, ventilation failures, and moisture ingress risks
- 6.6 We will take responsibility for proactively diagnosing and resolving damp and mould in a timely and effective way.
- 6.7 We will ensure our retrofit programmes consider and help prevent condensation, damp, and mould.
- 6.8 We will consider whether any properties which are affected by condensation, damp and mould are also affected by the hazard of excess cold and will act to also address that hazard.
- 6.9 We will ensure our reporting systems and processes are accessible and treat tenants reporting damp and mould with empathy and respect and will not prejudge the reason for any issue.
- 6.10 We will operate an open and transparent complaints process which is proactively communicated to tenants.
- 6.11 We will ensure our tenant engagement strikes the right tone and provides support to tenants to avoid condensation, damp, and mould in properties.
- 6.12 We will ensure our frontline staff are trained to spot potential issues with condensation, damp, mould, and condensation, so they can proactively advise tenants, diagnose problems, and provide solutions.
- 6.13 Where properties may be earmarked for disposal, we will take steps to ensure that they do not deteriorate to an unacceptable condition and regularly engage with tenants living in them.
- 6.14 Tenant information, including details of any known vulnerabilities or support needs, will be accurately recorded and securely stored in accordance with data protection requirements, to ensure that up-to-date information is available to inform assessments of whether a reported issue constitutes a significant or emergency hazard.

## 7.0 Dealing with Damp and Mould

- 7.1 We will take a proactive, data led approach to dealing with damp and mould and proactively manage risk through cyclical surveying of stock, reactive repairs, planned preventative investment, and providing advice and guidance to tenants.
- 7.2 When a property becomes vacant, and prior to re-letting, we will identify and remediate any issues that may cause damp and any of the symptoms of or consequential damage arising from condensation, damp, and mould. We will follow our Empty Homes Policy process, which may include ensuring doors and windows are serviceable and can

effectively ventilate the property, ensuring extractor fans are working well, as well as applying mould treatments where necessary.

- 7.3 Tenants are required to report any issues to us as soon as possible after noticing a problem. When we receive a report, any cases that are not deemed an emergency under Awaab's Law we will send a surveyor to attend the property to determine the root cause and seek to resolve the immediate issue.
- 7.4 Where damp is because of condensation, we will work with our tenants to undertake any appropriate remedial work to prevent the damp and mould occurring. This might include advice about how to control moisture levels or increase ventilation or heating, so that relative humidity is kept within the optimum range for comfort and prevention of dust mites and mould spores.
- 7.5 When a severe or recurring condensation, damp or mould issue is identified we will undertake a comprehensive risk assessment which might result in a range of actions to support the tenant depending on their circumstances. This may include providing dehumidifiers, the installation of positive input ventilation, mechanical or passive ventilation systems, and data tags for ongoing monitoring, as appropriate, on a case-by-case basis.
- 7.6 We will keep tenants informed of any property inspections, diagnosis of issues and the timetabling of works, where these are required. This includes explaining to them why work might be needed and what work might be done. If any changes to the programme of works are needed, we will keep them informed. Where work is not required, tenants will be informed, and we will explain the reason why no further work is needed and the steps they should take.
- 7.7 For more complex cases, and especially where more intrusive building work is required and/or there is a serious health risk to the tenant or a member of their household, we will utilise specialist contractors and consultants, such as structural engineers. We may require them to move out of their home either on a temporary or permanent basis. We will consider the individual circumstances of the tenant and engage with them as part of our decision-making process and to find suitable alternative accommodation. We will ensure that appropriate checks are carried out at the property to ensure it is suitable for the tenant to return to.
- 7.8 Our tenancy (and leasehold) agreements require tenants to allow us (including appointed contractors) access to their home to carry out works at the agreed appointment time. If we are unable to gain access and the integrity of the property, its fabric and/or the safety of the customer or those in the vicinity of the property is compromised, we will take appropriate action. For example, this may include but is not limited to obtaining an injunction for access.

- 7.9 In line with our Complaints Policy, we will respond appropriately where we fail to deliver the service we have committed to. Service failures, including instances where damage to furniture or personal belongings has occurred, or where distress or inconvenience has been caused, will be investigated and addressed in accordance with our complaints handling arrangements. Each case will be considered on its own merits, taking into account the nature, severity and impact of the service failure, as well as the individual circumstances of the tenant and their household. Where appropriate, remedies, including compensation, will be considered in line with our policies.

## 8.0 Data and Records

- 8.1 We will ensure our approach to record keeping is accurate and robust, and supports a risk-based, zero tolerance approach to dealing with damp and mould.
- 8.2 We will maintain a core asset register of all properties we own and/or manage, with component/attribute data against each property on our QL system. Property files are also stored on our Documotive file repository.
- 8.3 We will operate a robust process to manage all changes to our asset holdings, including property acquisitions and disposals.
- 8.4 We will keep all records, warning notices and remedial work records for the duration that we own and manage the property. We will have robust processes and controls in place to maintain appropriate levels of security for all repairs, inspection, condensation, damp and mould related data and records.

## 9.0 Tenant Engagement and Support

- 9.1 Our communications strategy will include a communications programme aimed at supporting tenants in their understanding of condensation, damp and mould. This will include information on how to report concerns, the actions we will take, and how tenants can access our complaints procedure.
- 9.2 This will assist us in maximising access to assess risks and take remedial action, encourage, and support tenants to report any concerns about condensation, damp, and mould, and help us engage with vulnerable and hard to reach tenants.
- 9.3 We will share information clearly and transparently and will ensure that information is available to tenants via regular publications and information on our website.
- 9.4 We will give tenants advice on how to prevent condensation and what they can do to remove mild cases of mould.
- 9.5 We know that some tenants cannot afford to heat their homes adequately and may be suffering from fuel poverty. We will work with tenants to ensure that they are receiving the income to which they are entitled. We will support any referrals for poverty funding



and income maximisation to Benefit and Money Team, as well as signposting where applicable

- 9.6 Where homes are overcrowded, humidity will tend to be higher, and this increases the likelihood of condensation. We will work with the tenant and explore solutions which may include moving to a more suitable home if this is available and appropriate. While we look to move tenants to a more suitable home, we will look into short and medium-term measures that will help reduce the moisture levels in the interim.
- 9.7 We aim to resolve complaints as quickly as possible without tenants needing to resort to disrepair claims and legal action. We will follow guidance in the Housing Ombudsman's Complaint Handling Code to take action to put things right without waiting for the complaints procedure to be completed. We will engage with the Housing Ombudsman Dispute Support Team for guidance if required.
- 9.8 Where legal action is taken, we will follow the Pre-Action Protocol for Housing Conditions Claims (England) so that we may resolve the dispute outside of court to help ensure issues are resolved quicker for customers.

## 10.0 Competent Persons

- 10.1 Our staff and contractors will have the skills and knowledge to identify signs of condensation, damp, and mould, and discuss with tenants how to manage problems. Staff will be encouraged to look out for signs whenever they visit a tenant's home.
- 10.2 The Damp and Mould Manager will hold at least one of the following qualifications: High National Building Certificate, RICS, BSC or Expert witness certification (or appropriate asset management equivalent). If they do not have at least one of the listed or equivalent qualifications already, they will obtain within 24 months of the approval of this policy.
- 10.3 We will check our contractors hold the relevant qualifications and accreditations when we procure them, and thereafter on an annual basis; we will evidence these checks and each contractor's certification appropriately.

## 11.0 Training

- 11.1 We will deliver training on this policy and the procedures that support it, through appropriate methods including team briefings; basic condensation, damp, and mould awareness training; and on the job training for those delivering planned maintenance and repair works as part of their daily job. All training undertaken by staff will be formally recorded.
- 11.2 We will share learning from complaints and the positive impact of changes made as a result within the organisation and externally, to promote a learning culture.

## 12.0 Performance Reporting

12.1 We will report robust key performance indicator (KPI) measures for condensation, damp, and mould. We will report to the following strategic groups:

Report recipient	Frequency
Regulator of Social Housing	Annual
Compliance Monitoring Group	Monthly
Housing Cabinet Committee	Quarterly
Tenants	Quarterly

12.2 As a minimum, we will report:

### Response & Investigation KPI's:

- Number of open cases.
- Total number of emergency hazards.
- Total number of significant hazards.
- Hazards that fall outside of Awaab's Law.
- Percentage of cases with report sent within 3 working days.
- Percentage of inspections completed within ten working days.
- Percentage of emergency cases actioned within 24 hours.
- Percentage of significant hazards remediated within 5 working days.
- Percentage of significant hazards follow on works started within five working days.
- Percentage of significant hazards remedial works started within 12 weeks.
- Oldest open case (in days).

### Narrative - an explanation of the:

- Current position.
- Corrective action required.
- Anticipated impact of corrective actions.
- Progress with completion of repairs works.

## 13.0 Quality Assurance

13.1 We will ensure there is a programme of post inspections in place to ensure the quality of repair work that is carried out to address condensation, damp and mould. This will be:

- Ten per cent of responsive repairs for works to address the root cause or symptoms of condensation, damp, and mould.
- 100 per cent of all works carried out following complaints of condensation, damp, or mould.

- 100 per cent of all works carried out to resolve disrepair claims. This includes three month, and six month follow up visits.

- 13.2 We will introduce an approach to revisiting tenants who have had a confirmed case of condensation, damp and/or mould to ensure that our repairs, advice, or other action has resolved the issue. This will include a handover with the tenant, and we will send out letters at six months and 12 months following the repairs. For more complex repairs, a surveyor will post inspect the works to ensure the issues have been resolved.
- 13.3 We will carry out an independent audit of our approach to identifying and addressing damp and mould at least once every two years, to specifically test for compliance with legal and regulatory obligations and to identify non-compliance issues for correction.

#### 14.0 **Significant Non-Compliance and Escalation**

- 14.1 Our definition of significant non-compliance is any incident which has the potential to result in a potential breach of legislation or regulatory standard, or which causes a risk to health or safety. All non-compliance issues will be reported and escalated as soon as possible, and no later than 24 hours after the incident occurred, or of a CBC employee becoming aware of it.
- 14.2 Any non-compliance issue identified at an operational level will be formally reported to the **Head of Regulatory Compliance** in the first instance, who will agree an appropriate course of corrective action with the Damp and Mould Manager and report details of the same to the Compliance Monitoring Group.
- 14.3 The Compliance Monitoring Group will ensure that the Housing Cabinet Committee are made aware of any non-compliance issue, so they can consider the implications and act as appropriate.
- 14.4 In cases of serious non-compliance, Housing Cabinet Committee will consider whether it is necessary to disclose the issue to the Regulator of Social Housing as required by the regulatory framework, or any other relevant organisation such as the Health and Safety Executive.

#### 15.0 **Glossary**

- 15.1 This glossary defines key terms used throughout this policy:
- **HHSRS:** the Housing Health and Safety Rating System. This is the Government's prescribed approach to the evaluation of the potential risks to health and safety from any deficiencies identified in dwellings. There are 29 HHSRS hazards, including the hazard of damp and mould.
  - **Category 1 HHSRS hazard:** the most serious hazards, which mean that the property fails to meet the legal minimum standard for property condition. Where a local housing authority becomes aware of a property with a category

1 hazard, they have a duty to take enforcement action, for example by serving a notice to require the risk to be reduced.

- **Category 2 HHSRS hazard:** these are less serious hazards; the local housing authority has the power to take enforcement action but is not obliged to.
- Under Awaab’s Law, a “**significant hazard**”: refers to any condition within a dwelling that presents a material risk of harm to the health or safety of an occupier, which a reasonable landlord, possessing the relevant knowledge, would be expected to address as a matter of urgency.
- Under Awaab’s Law, an “**emergency hazard**” refers to a condition that poses an imminent and significant risk of harm to the health or safety of an occupier, which a reasonable landlord would be expected to make safe within 24 hours.

## Appendix 1 - Additional Legislation

This policy also operates within the context of the following legislation:

- Defective Premises Act 1972
- Health and Safety at Work Act 1974
- The Occupiers' Liability Act 1984
- Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Building Regulations 2010 (England and Wales)
- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)
- Construction (Design and Management) Regulations 2015
- Data Protection Act 2018
- Equality Act 2010

Guidance and other related information:

- Housing, Health, and Safety Rating System (HHSRS) Operating Guidance, 2006
- Pre-action Protocol for Housing Condition Claims (England) 2021
- Housing Ombudsman Spotlight Report: It's not lifestyle (November 2021)

## Appendix 2 – Related Policies

- Compensation Policy
- Complaints Policy
- Required Moves Policy
- Disrepair Policy
- Repairs and Maintenance Policy
- Rechargeable Repairs Policy
- HHSRS Policy
- Tenancy Policy
- Estate and Tenancy Management Policy

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## Damp and Mould Policy – What Tenants Need to Know

### Why this matters:

Cheltenham Borough Council (CBC) wants all tenants to live in safe, healthy homes. Damp and mould can harm your health and damage your home.

### Our Commitment

- We will keep homes dry, warm, and safe.
- We will act quickly to fix problems and comply with the law, including Awaab's Law, which sets strict timeframes for repairs.

### What Causes Damp and Mould?

- Leaks from pipes or roofs.
- Rising damp from the ground.
- Penetrating damp from defects in walls or roofs.
- Condensation from moisture in the air meeting cold surfaces.

### What We Will Do

- Investigate reports of damp and mould promptly.
- For serious hazards:
  - **Emergency hazards:** Make safe within **24 hours**.
  - **Significant hazards:** Investigate within **10 working days**, start repairs within **5 working days**, and complete them within **12 weeks**.
- Keep you informed about inspections, repairs, and timelines.
- Use specialist contractors if needed and provide alternative accommodation if your home becomes unsafe.

### Your Role

- Report any damp or mould issues as soon as you notice them.
- Allow access for inspections and repairs.
- Follow advice we give to help reduce condensation (like ventilating rooms and managing moisture).

### Extra Support

- We'll give advice on preventing condensation and removing mild mould.
- If you struggle to heat your home or live in overcrowded conditions, we'll work with you to find solutions and offer support.

### Complaints

- If we don't meet our commitments, you can use our complaints process. We aim to resolve issues quickly and fairly.

### Where to Find More Information

- Visit our website for tips on preventing damp and mould and details on how to report problems.

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## Introduction

An Equality Impact Assessment (EqIA) is a method for assessing the effects or impacts of a council policy or function on removing barriers to equality.

The Equality Act 2010 includes a public sector equality duty which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made.

Examples of when an EqIA should be completed are:

<ul style="list-style-type: none"><li>Any proposals to introduce or add to a service</li></ul>	<ul style="list-style-type: none"><li>Any proposals to adopt policy priorities, strategies and plans</li></ul>
<ul style="list-style-type: none"><li>Any proposals to remove, reduce or alter a service</li></ul>	<ul style="list-style-type: none"><li>Changes to staffing structure where groups of employees are likely to be negatively affected</li></ul>
<ul style="list-style-type: none"><li>Any new policies or changes to policies</li></ul>	<ul style="list-style-type: none"><li>Any proposals in relation to procured or commissioned services</li></ul>

## Stage 1 - Equality Screening

Whenever a policy/service or function is reviewed, changed, developed or removed an initial equality impact assessment stage 1 will need to be undertaken. This is a screening template and will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy development.

## Stage 2 – Equality Impact Assessment

This is the full EqIA and seeks to identify the equality considerations that have been taken into account including any mitigating actions proposed and ensures decisions are based on evidence. The EqIA will need to be agreed with the appropriate Head of Service or Director and should be included on the decision making report, along with commentary on the assessment in the main body of the report.

**1. Identify the policy, project, function or service change**

**a. Person responsible for this EqIA**

Officer responsible: Claire Hughes	Service Area: Housing Services
Title: Director of Governance, Housing and Communities	Date of assessment: 06/01/2026
Signature: <i>Claire Hughes</i>	

**b. Is this a policy, function, strategy, service change or project?**

Policy

If other, please specify:

**c. Name of the policy, function, strategy, service change or project**

Damp, Mould and Condensation Policy

Is this new or existing? **New or proposed**

**Please specify reason for change or development of policy, function, strategy, service change or project**

The policy has been developed to demonstrate how the Council will deal with issues of damp, mould and condensation within its housing stock

**d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?**

Aims:	The aim of this policy is to ensure that the Council's process for dealing with issues of damp, mould and condensation within its housing stock is clearly set out.
Objectives:	<p>The policy will:</p> <ul style="list-style-type: none"> <li>Set out how the council will deal with issues of damp, mould and condensation within its housing stock</li> </ul>
Outcomes:	Tenants and staff will be aware of the processes followed by the council to deal with issues of damp, mould and condensation within its housing stock
Benefits:	<p>This policy should offer assurance to tenants that the council is meeting its legal obligations in dealing with damp, mould and condensation.</p> <p>Employees of the Council can utilise this policy to ensure correct processes are utilised.</p>

**e. What are the expected impacts?**

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.

**No**

Do you expect the impacts to be positive or negative?

**No impact expected**

Please provide an explanation for your answer:

This policy is equally applicable to all tenants.

**If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.**

**f. Identify next steps as appropriate**

Stage Two required

**No**

Owner of Stage Two assessment

Completion date for Stage Two assessment

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## Cheltenham Borough Council

### Cabinet Housing Committee – 21<sup>st</sup> January 2026

## E-bike and Battery Policy

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#### Accountable member:

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

#### Accountable officer:

Caroline Walker , Director of Housing , Customer Services and Communities

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#### Executive summary:

The purpose of this policy sets out how Cheltenham Borough Council manages the safe use, storage and charging of electric bicycles (e-bikes) and their lithium-ion batteries within properties by Cheltenham Borough Council Housing Services, reducing fire risk and protecting tenants, staff, and property.

#### Recommendations:

1. That the policy are noted by Cabinet Housing Committee.
  2. That the policy is recommended for approval by Cabinet.
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### 1 Background

Cheltenham Borough Council Housing Services over the last 2 years have had 4 property fires that have been related to the charging of e-batteries in tenants home. These fires have caused considerable damage to the property and the loss of tenants belongings.

This new policy along side a campaign will help tenants understand how to charge/store appliances and the potential risks to them and their homes.

- 2 See attached E-bike and Battery Policy

#### Report author:

Caroline Walker , Director of Housing , Customer Services and Communities

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**Appendices:**

Appendix 1 - E-bike and Battery Policy

Appendix 2 – Tenant Friendly Summary of E-bike and Battery Policy

Appendix 3 – E-bike and Battery Policy Equality Impact Assessment

Appendix 4 - NFCC Fire Safety Guidance for E-bikes and E-scooters

Appendix 5 - UK Government Lithium-ion for Battery Safety Guidelines

## Cheltenham Borough Council policy

### E-Bike and Battery Safety Policy

#### Version control

**Document name:** E-Bike and Battery Safety Policy

Version: 1.0

Responsible officer

- Justine Skitt, Tenancy Management Team Leader

Approved by: Housing Committee

Next review date: January 2029 (or change to relevant legislation)

Retention period:

#### Revision history

Revision date	Version	Description
date		

#### Consultees

##### Internal

- Caroline Walker, Director of Housing, Customer Services & Communities

##### External

- Tenants

#### Distribution

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## Introduction and purpose of the policy

The purpose of this policy sets out how Cheltenham Borough Council manages the safe use, storage and charging of electric bicycles (e-bikes) and their lithium-ion batteries within properties by Cheltenham Borough Council Housing Services, reducing fire risk and protecting tenants, staff, and property.

## Aims and scope of the policy

This policy applies to:

- All tenants, leaseholders and residents in properties managed by Cheltenham Borough Council Housing Services.
- All communal areas, dwellings managed by Cheltenham Borough Council Housing Services and storage facilities.

## Policy Statement

E-bikes and their batteries present a potential fire hazard if not used and maintained correctly. Cheltenham Borough Council is committed to:

- Complying with the Regulatory Reform (Fire Safety Order 2005, Health and Safety at Work Act 1974 and relevant housing regulations.
- Implementing measures to minimise risks associated with lithium-ion batteries.



## Key Requirements

### Storage

- E-bikes must not be stored in communal areas, escape routes, or near fire exits.
- Tenants may store e-bikes in their own property if space allows and does not obstruct exits.

### Charging

- Charging in communal areas is strictly prohibited.
- Tenants must:
  - Use manufacturer- approved charges only.
  - Charge batteries while awake, never overnight.
  - Keep batteries away from flammable materials during charging.
  - Avoid charging near doors or escape routes.

### Battery Safety

- Inspect batteries regularly for damage, swelling or overheating.
- Do not use damaged or non-original batteries.
- Report any concerns immediately to Cheltenham Borough Council.

## Enforcement Procedures

To ensure compliance with this policy:

### Monitoring

- Regular inspections of communal areas will be carried out by Cheltenham Borough Council Housing Services.
- Fire risk assessments will include checks for e-bike storage and charging.

### Action on Breach

- **First breach** – Written warning issued to tenant with guidance on safe practices.
- **Second breach** – Formal notice under tenancy agreement, removal of e-bike from communal areas at tenants' cost.
- **Persistent or serious breach:**
  - Possible tenancy enforcement action (e.g. breach of tenancy conditions).
  - Referral to fire safety authorities if risk is severe.

## **Emergency Situations**

- If an e-bike battery or bike poses an immediate fire risk, Cheltenham Borough Council reserves the right to remove the item without prior notice for safety reasons.

## **Record keeping**

- All breaches and actions taken will be logged in their tenancy management system.

## **Tenant Guidance**

Cheltenham Borough Council will provide:

- Safety leaflets on e-bike battery use.
- Links to official guidance from the NFCC and OPSS.

## **Complaint and Appeals**

If a tenant/applicant is not happy with any element of CBC's service received, they will be able to make a formal complaint. The complaint will be dealt with in line with CBC's Complaints and Compliments policy.

## **Equality and Diversity**

CBC is committed to the principle of equality of opportunity in the delivery of its services. CBC aims to ensure all its tenants are dealt with fairly and equitably and, where possible, taking into account the diverse nature of cultures and backgrounds.

An Equality Analysis Form has been completed in the production/review of this policy.

## **Monitoring and Review**

The Tenancy Services Team Leader is responsible for monitoring this policy ensuring it is being correctly applied, and is also responsible for ensuring reviews of this policy are carried out.

CBC will undertake regular reviews of this policy, any procedures related to it and staff training needs, ensuring service improvements are made and implemented.



There will be an automatic review of this policy whenever there is a change of policy from the government, or change to legislation. In the absence of any other trigger, the policy will be reviewed at intervals of no more than three years.

## References

- NFCC Fire Safety Guidance for E-Bikes & E- Scooters
- UK Government Lithium-ion Battery Safety Guidelines.

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# E-Bike and Battery Safety – Tenant Guide

Cheltenham Borough Council wants to keep everyone safe when using electric bikes (e-bikes) and their batteries. This guide explains how to store, charge, and look after your e-bike safely.

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## Why is this important?

E-bikes use lithium-ion batteries, which can cause fires if damaged or charged incorrectly. Following these rules helps protect you, your neighbours, and your home.

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## What you need to do

### Storage

- **Do not store e-bikes in communal areas** (hallways, stairwells, shared spaces) or near fire exits.
  - You can keep your e-bike inside your home **if it doesn't block doors or escape routes**.
- 

### Charging

- **Never charge your e-bike in communal areas.**
  - Always:
    - Use the **charger provided by the manufacturer**.
    - Charge batteries **when you are awake** – never overnight.
    - Keep the battery **away from anything that can catch fire** while charging.
    - Avoid charging near doors or escape routes.
- 

### Battery Safety

- Check your battery regularly for:
  - Damage
  - Swelling
  - Overheating
- **Do not use damaged batteries** or non-original replacements.

- If you notice a problem, **contact Cheltenham Borough Council immediately.**
- 

## Fire Safety

- If your e-bike or battery looks dangerous or could cause a fire, we may remove it straight away for safety reasons.
- 

## What happens if rules are broken?

- **First time:** You'll get a written warning and advice.
  - **Second time:** Formal notice and removal of the e-bike from communal areas (at your cost).
  - **Serious or repeated breaches:** We may take tenancy enforcement action or contact fire safety authorities.
- 

## Need help or more information?

- We'll provide safety leaflets and links to official guidance.
  - If you're unhappy with our service, you can make a formal complaint under our Complaints and Compliments policy.
- 

## Equality

We treat all tenants fairly and consider different needs and backgrounds.

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## Review

This policy will be reviewed regularly and updated if laws change.

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## References:

- NFCC Fire Safety Guidance for E-Bikes & E-Scooters
- UK Government Lithium-ion Battery Safety Guidelines

# Equality Impact Assessment

## Introduction

An Equality Impact Assessment (EqIA) is a method for assessing the effects or impacts of a council policy or function on removing barriers to equality.

The Equality Act 2010 includes a public sector equality duty which requires public authorities to try and eliminate discrimination; advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it and promote equality and good relations across a range of protected characteristics.

The protected characteristics are:

Age	Disability	Gender Reassignment
Marriage and civil partnership	Pregnancy and maternity	Race
Religion or belief (including lack of belief)	Sex	Sexual orientation

An EqIA should be completed with the full range of protected characteristics considered during the initial stages of developing new strategies, policies, functions or services, prior to starting a procurement exercise and before decisions are made.

Examples of when an EqIA should be completed are:

<ul style="list-style-type: none"> <li>Any proposals to introduce or add to a service</li> </ul>	<ul style="list-style-type: none"> <li>Any proposals to adopt policy priorities, strategies and plans</li> </ul>
<ul style="list-style-type: none"> <li>Any proposals to remove, reduce or alter a service</li> </ul>	<ul style="list-style-type: none"> <li>Changes to staffing structure where groups of employees are likely to be negatively affected</li> </ul>
<ul style="list-style-type: none"> <li>Any new policies or changes to policies</li> </ul>	<ul style="list-style-type: none"> <li>Any proposals in relation to procured or commissioned services</li> </ul>

## Stage 1 - Equality Screening

Whenever a policy/service or function is reviewed, changed, developed or removed an initial equality impact assessment stage 1 will need to be undertaken. This is a screening template and will help establish whether a full assessment is needed. This should be done at an early stage of the process so that it is part of policy development.

## Stage 2 – Equality Impact Assessment

This is the full EqIA and seeks to identify the equality considerations that have been taken into account including any mitigating actions proposed and ensures decisions are based on evidence. The EqIA will need to be agreed with the appropriate Head of Service or Director and should be included on the decision making report, along with commentary on the assessment in the main body of the report.

**STAGE 1 – Equality Screening****1. Identify the policy, project, function or service change****a. Person responsible for this EqIA**

Officer responsible: Justine Skitt

Service Area: Housing Services

Title: Tenancy Management Team Leader

Date of assessment: 30<sup>th</sup> December 2025Signature: *Justine Skitt***b. Is this a policy, function, strategy, service change or project?**

Policy

If other, please specify:

**c. Name of the policy, function, strategy, service change or project**

E-bike and Battery Policy

Is this new or existing?

New or proposed

**Please specify reason for change or development of policy, function, strategy, service change or project**

The purpose of this policy sets out how Cheltenham Borough Council manages the safe use, storage and charging of electric bicycles (e-bikes) and their lithium-ion batteries within properties by Cheltenham Borough Council Housing Services, reducing fire risk and protecting tenants, staff, and property

**d. What are the aims, objectives and intended outcomes and who is likely to benefit from it?**

Aims:

To ensure that all residents use e-bike and battery correctly to reduce risk of self harm and property harm.

Objectives:

To ensure residents understand their responsibility when storing/charging of e-bikes and batteries

Outcomes:

Cheltenham Borough Council tenants to understand their rights as a tenant.

Benefits:

To reduce the potential risk to person or property.



**e. What are the expected impacts?**

Are there any aspects, including how it is delivered or accessed, that could have an impact on the lives of people, including employees and customers.

**No**

Do you expect the impacts to be positive or negative?

**No impact expected**

Please provide an explanation for your answer:

Policy will provide details to all residents of their responsibility when using/storing/charging e-bike and batteries

**If your answer to question e identified potential positive or negative impacts, or you are unsure about the impact, then you should carry out a Stage Two Equality Impact Assessment.**

**f. Identify next steps as appropriate**

Stage Two required

**Yes**

Owner of Stage Two assessment

**Justine Skitt**

Completion date for Stage Two assessment

**30<sup>th</sup> December 2025**

**Please forward this completed form to [add email address] and move on to Stage 2 if required.**

## **STAGE 2 – Full Equality Impact Assessment**

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### **2. Engagement and consultation**

The best approach to find out if a policy etc, is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those equality groups.

**a. Research and evidence**

List below any data, consultations (previous, relevant, or future planned), or any relevant research, studies or analysis that you have considered to assess the policy, function, strategy, service change or project for its relevance to equality.

Best Practice

**b. Consultation**

Has any consultation be conducted?

**No**

Describe the consultation or engagement you have conducted or are intending to conduct. Describe who was consulted, what the outcome of the activity was and how these results have influenced the development of the strategy, policy, project, service change or budget option.

If no consultation or engagement is planned, please explain why.

Policy seen to reviewed by a group of Cheltenham Borough Council tenants at next tenant panel.

**3. Assessment**

**a. Assessment of impacts**

For each characteristic, please indicate the type of impact (positive – contributes to promoting equality or improving relations within an equality group, neutral – no impact, negative – could disadvantage them).

Please use the description of impact box to explain how you justify the impact and include any data and evidence that you have collected from surveys, performance data or complaints to support your proposed changes

Protected Characteristic	Specific Characteristic	Impact	Description of impact	Mitigating Action
<b>AGE</b>	Older people (60+)	Neutral		
	Younger People (16-25)	Neutral		
	Children (0-16)	Neutral		
<b>DISABILITY</b> A definition of disability under the Equality Act 2010 is available <a href="#">here</a> .  <i>See also carer responsibilities under other considerations.</i>	Physical disability	Neutral		
	Sensory Impairment (sight, hearing)	Neutral		
	Mental health	Neutral		
	Learning Disability	Neutral		
<b>GENDER REASSIGNMENT</b>		Neutral		
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	Women	Neutral		
	Men	Neutral		
	Lesbians	Neutral		
	Gay Men	Neutral		
<b>PREGNANCY &amp; MATERNITY</b>	Women	Neutral		
<b>RACE*</b> Further information on the breakdown below each of these headings, is available <a href="#">here</a> .	White	Neutral		
	Mixed or multiple ethnic groups	Neutral		
	Asian	Neutral		

For example Asian, includes Chinese, Pakistani and Indian etc	African	Neutral		
	Caribbean or Black	Neutral		
		Neutral		
<b>RELIGION &amp; BELIEF**</b> A list of religions used in the census is available <a href="#">here</a>	See note	Neutral		
<b>SEX (GENDER)</b>	Men	Neutral		
	Women	Neutral		
	Trans Men	Neutral		
	Trans Women	Neutral		
<b>SEXUAL ORIENTATION</b>	Heterosexual	Neutral		
	Lesbian	Neutral		
	Gay	Neutral		
	Bisexual/Pansexual	Neutral		
<b>Other considerations</b>				
<b>Socio-economic factors</b> (income, education, employment, community safety & social support)		Neutral		
<b>Rurality</b> i.e. access to services; transport; education; employment; broadband		Neutral		
<b>Other (e.g. caring responsibilities)</b>		Neutral		

\* To keep the form concise, race has not been included as an exhaustive list, please augment the list above where appropriate to reflect the complexity of other racial identities.

\*\* There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions in the census is available [here](#)

#### 4. Outcomes, Action and Public Reporting

a. Please list the actions identified through the evidence and the mitigating action to be taken.

Action	Target completion date	Lead Officer

b. Public reporting

All completed EqIA's are required to be publicly available on the Council's website once they have been signed off. EqIA's are also published with the papers for committee and full council decisions.

Please send completed EqIA's to [email address]

#### 5. Monitoring outcomes, evaluation and review

The Equalities Impact Assessment is not an end in itself but the start of a continuous monitoring and review process. The relevant Service or Lead Officer responsible for the delivery of the policy, function or service change is also responsible for monitoring and reviewing the EqIA and any actions that may be taken to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from Corporate Policy and Governance will be available to provide support and guidance, please email xxxx if you have any questions.

#### 6. Change log

Name	Date	Version	Change

# E-bikes and e-scooters fire safety guidance

E-bikes and e-scooters are becoming increasingly popular. Most are powered by lithium-ion batteries, which can be charged in the home. The use of these batteries in a wide range of household products is becoming increasingly common.

It is important, when charging e-bikes and e-scooters, you do so safely to avoid a risk of a fire starting and putting your families and homes at risk.

With an increased use of e-bikes and e-scooters, comes a corresponding fire safety concern associated with their charging and storage. The use of these products is expected to continue to rise. Some fire services and fire investigators have seen a rise in e-bike and e-scooter battery fires.

Currently, there is limited data relating to the number of fires, but London Fire Brigade reported 8 fires caused by e-bikes and e-scooters in 2019. This rose to twenty-four in 2020 and fifty-nine by December 2021.

On occasions, batteries can fail catastrophically, they can 'explode' and/or lead to a rapidly developing fire.

The incorrect disposal of lithium-ion batteries in general household and recycling waste can lead to significant waste fires. Prevention messaging is therefore important in supporting both FRS protection and operational staff.

## Key messages

**The following messages can be useful in communicating the risk and minimising the risk of fire to the public:**

### Charging

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- Charge batteries whilst you are awake and if a fire should occur you can respond quickly. Don't leave batteries to charge while you are asleep or away from the home.
- Always use the manufacturer approved charger for the product, and if you spot any signs of wear and tear or damage, buy an official replacement charger for your product from a reputable seller.
- Do not cover chargers or battery packs when charging, as this could lead to overheating or even a fire.
- Do not charge batteries or store your e-bike or e-scooter near combustible or flammable materials.
- Do not overcharge your battery – check the manufacturer's instructions for charge times.
- Do not overload socket outlets or use inappropriate extension leads (use uncoiled extensions and ensure the lead is suitably rated for what you are plugging in to it).
- In the event of an e-bike, e-scooter or lithium-ion battery fire – do not attempt to extinguish the fire. Get out, stay out, call 999.

## Storage

- Avoid storing or charging e-bikes and e-scooters on escape routes or in communal areas of a multi occupied building. If there's a fire, it can affect people's ability to escape.
- Responsible Persons should consider the risks posed by e-bikes and e-scooters where they are charged or left in common areas such as means of escape, bike stores and mobility scooter charging rooms. They may wish to offer advice to residents on the safe use, storage and charging of these products.
- Store e-bikes and e-scooters and their batteries in a cool place. Avoid storing them in excessively hot or cold areas.
- Follow manufacturer's instructions for the storage and maintenance of lithium -ion batteries if they are not going to be used for extended periods of time.

## Buying

- Buy e-bikes, e-scooters and chargers and batteries from reputable retailers.
- Many fires involve counterfeit electrical goods. Items which don't meet British or European standards pose a huge fire risk and while genuine chargers (or battery packs) may cost more, it's not worth putting your life at risk and potentially destroying your home by buying a fake charger to save a few pounds.
- If buying an e-bike conversion kit, purchase from a reputable seller and check that it complies with British or European standards. Take particular care if buying from online auction or fulfilment platforms. Also be aware that if buying separate components, you should check that they are compatible.

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- Batteries can be damaged by dropping them or crashing e-bikes or e-scooters. Where the battery is damaged, it can overheat and catch fire without warning. Check your battery regularly for any signs of damage and if you suspect it is damaged it should be replaced and should not be used or charged.
- If you need to dispose of a damaged or end of life battery, don't dispose of it in your household waste or normal recycling. These batteries, when punctured or crushed, can cause fires in bin lorries, recycling and waste centres. Your e- bike or e- scooter manufacturer may offer a recycling service. Alternatively, check with your local authority for suitable battery recycling arrangements in your area.

Enjoy and ride your e-bike or e-scooter safely and ensure you are using these products within the law. Further information can be found here <https://www.gov.uk/electric-bike-rules> and [for e-scooters](#)

Further information around lithium-ion batteries is available from NFCC via [FRS Learn](#)

## E-bikes and e-scooters fire safety guidance

PDF Format



**NFCC**  
National Fire  
Chiefs Council

**National Fire Chiefs Council Limited...**

71-75 Shelton Street, Covent Garden, London, WC2H 9JQ



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Guidance

# **Statutory guidelines on lithium-ion battery safety for e-bikes**

Guidance for businesses.

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From: **Office for Product Safety and Standards**

**(/government/organisations/office-for-product-safety-and-standards)**

Published 12 December 2024

<b>Applies to England, Scotland and Wales</b>
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Contents

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- 8) Product safety assessment: demonstrating protections against thermal runaway (Distributors)
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These statutory guidelines are made by the Department for Business and Trade to assist businesses in producing safe lithium-ion batteries for use in e-bikes.

Lithium-ion batteries used in e-bikes can pose a serious fire risk through a process known as thermal runaway. At least 10 fatalities occurred in fires started in e-bikes or e-scooters powered by lithium-ion batteries in the UK in 2023, with almost 200 fires recorded.

These statutory guidelines set out the safety mechanisms that lithium-ion batteries for e-bikes must contain to address the risk of thermal runaway. They must be taken into account by producers of lithium-ion batteries when assessing whether their battery meets legal safety requirements and by distributors in ensuring they do not supply products that they know or ought to know to be dangerous, in line with their legal requirements under the [General Product Safety Regulations 2005](https://www.legislation.gov.uk/ukxi/2005/1803/contents) (<https://www.legislation.gov.uk/ukxi/2005/1803/contents>) (GPSR) as it applies in Great Britain (GB). However, adherence to these guidelines is strongly recommended for businesses placing such products anywhere on the UK market.

The GPSR applies to all lithium-ion batteries for e-bikes, including those sold online or those sold for use with or as part of a conversion kit. It is an offence to place a lithium-ion battery on the market if it is not a safe product.

The Office for Product Safety and Standards (OPSS), as the UK's national product regulator, and Local Authority Trading Standards, have powers to enforce the GPSR and there are sanctions, including criminal sanctions, for those that do not comply.

### 1) Who is this for

1.1 These statutory guidelines are for businesses who produce, import or distribute lithium-ion batteries for use with e-bikes, including converted e-bikes that are made available on the GB market.

1.2 These guidelines are made by the Secretary of State for Business and Trade under regulation 6(3)(c) of the GPSR. They must be taken into account by businesses when assessing whether a lithium-ion battery meets the general safety requirement under regulation 5 of the GPSR.

1.3 'Lithium-ion battery' should be taken to mean lithium-ion battery packs supplied for use with e-bikes or e-bike conversion kits, incorporating individual cells and protective measures that are intended to be charged

either with the e-bike or separately. Batteries, for example lithium-ion batteries used in laptop computers, are not in scope of these guidelines.

1.4 The guidelines focus on key areas of concern. The contents of these guidelines are not an exhaustive list of the actions businesses must take to meet the requirements of the GPSR when producing, importing or distributing products.

1.5 These guidelines will be used by regulators to help determine whether lithium-ion batteries meet the legal safety requirements under GPSR.

## **2) Products in scope of these guidelines**

2.1 E-bikes are typically powered by lithium-ion batteries. E-bikes can be sold as complete products (including a compatible battery pack and battery charger) and replacement batteries can be purchased for them. Standard pedal bikes can be converted to an e-bike, using a conversion kit comprising various parts that typically include some or all of: a motor, motor controller, battery, battery charger, handlebar controls, sensors and wiring to connect the components.

2.2 Lithium-ion batteries produced to supply power to e-bikes (including e-bike conversions) are in scope of the GPSR and must meet the general safety requirement of these regulations. The key requirement is that businesses must ensure that products placed on the market are safe.

## **3) Battery safety and thermal runaway**

3.1 Poorly designed, poorly manufactured or incompatible battery components, and the use of batteries outside of their safe design parameters, present a risk of thermal runaway.

3.2 Thermal runaway happens when the temperature of individual battery cells contained within a battery reaches a critical point at which exothermic reactions occur. Exothermic reactions are chemical reactions that generate heat faster than it can be dissipated within the battery cell. This creates gas within the cell, causing the cell casing to rupture, which can result in the release of flammable and potentially toxic gases that could ignite, causing a fire and/or explosion. This has the potential to endanger life and destroy property.

3.3 Battery cells in thermal runaway are likely to increase the temperature of adjacent cells within the battery pack, resulting in additional cells entering thermal runaway and a cascading effect throughout the battery. This can result in gases igniting, causing a fire and/or explosion that can develop

## **4) Regulatory position on safe products under GPSR**

### **Battery protective system**

4.1 To be considered a safe product under GPSR, a lithium-ion battery intended for use with e-bikes or e-bike conversion kits must include safety mechanism(s) (such as a battery management system, and/or other equivalent safety features) whose functionality is capable of preventing thermal runaway from occurring during normal operation and conditions of reasonably foreseeable misuse. This includes when the e-bike is in use and the battery is discharging power, and when the battery is being charged.

4.2 A core safety mechanism could be the presence of an effective battery management system, which is a local energy management system for the battery pack/system. Its function includes protecting the battery system from damage, which in turn prevents the battery pack from entering thermal runaway. Where a battery management system is not present, a battery should have equivalent protective safety features that perform a comparable function.

4.3 An effective battery protection system must be capable of detecting the voltage of individual cells and the battery pack current, and the temperature of the cells during charging and discharging of the battery pack. It must be able to act to prevent charging or discharging from causing over- or under-voltage of any cell, over-current of the pack, and over- or under-temperature of the cells, to prevent the battery from entering into thermal runaway where operating outside of normal and manufacturer-stated parameters.

4.4 The battery protection system must also be capable of preventing the battery cells from entering thermal runaway as a result of the charging of the battery pack by an incompatible battery charger.

### **Battery design and physical construction**

4.5 The design and construction of a lithium-ion battery should sufficiently resist damage from external sources. This includes high and low temperatures (including sunlight), liquids (including water ingress), and reasonably foreseeable impact and vibration from normal wear and tear.

### **Information requirements**



4.6 Battery packs should be supplied with sufficient information to enable businesses and users to be able to assess the compatibility of the battery for its intended use. Particularly, information should be provided on sourcing compatible chargers.

4.7 Battery packs should be provided with sufficient information and instruction to inform users how to charge the product safely and to establish safe charging practices.

## 5) Producer responsibilities

5.1 The GPSR sets out the obligations of 'producers'. This includes businesses who manufacture and import products. The definition of a 'producer' is set out in Regulation 2 of the GPSR.

5.2 Before placing a product on the market, producers must ensure that it is safe. This means, under normal or reasonably foreseeable conditions of use, the product does not present any risk or presents only the minimum risk compatible with the product's use, and which is considered acceptable and consistent with a high level of protection of health and safety.

5.3 To achieve this, a producer must ensure that lithium-ion batteries produced for e-bikes possess adequate and effective safety protections to mitigate the risk of thermal runaway. They must also ensure that the battery is constructed in such a way that it is protected from reasonable external damage, and is supplied with relevant product information.

5.4 Producers must also adopt measures to enable them to be informed of risks the product might present, such as:

- a. sample test products they produce
- b. investigate and, if necessary, keep a register of complaints concerning the safety of the product
- c. keep distributors informed of the results of such monitoring where a product presents a risk or may present a risk

5.5 Where the producer knows that a product they have placed on the market or supplied poses risks to the consumer that are incompatible with the general safety requirement, they must notify OPSS or their Local Authority Trading Standards in writing about the risks and the action taken to prevent risk to the consumer.

5.6 OPSS has published [guidance on completing notifications to enforcement authorities regarding product safety risks](https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products) (<https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products>).



5.7 Additionally, the British Standard **Page 108** has published a [Code of Practice on Corrective Actions and Recalls](https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7100-product-recall-and-other-corrective-actions-code-of-practice/) (<https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7100-product-recall-and-other-corrective-actions-code-of-practice/>) that provides guidance on fulfilling these obligations.

## **6) Product safety assessment: demonstrating protections against thermal runaway (Producers)**

6.1 Producers should consider the following steps:

- Demonstrating the battery meets the safety requirements to protect against thermal runaway, or the causes of thermal runaway, as set out in relevant standards, and making use of the latest technologies.
- Compiling technical documentation that demonstrates the performance of safety mechanisms present in a lithium-ion battery, and how they are designed to protect against thermal runaway or the causes of thermal runaway.
- Holding copies of product test reports that demonstrate the performance of safety mechanisms present in a lithium-ion battery, designed to protect against thermal runaway or the causes of thermal runaway as set out in section 4, and providing this documentation to an enforcement authority upon request.

6.2 However, there may be other ways for producers to carry out a product safety assessment that demonstrates that a lithium-ion battery in scope of these guidelines is a safe product.

6.3 These guidelines do not specify the routes producers must take. Businesses are responsible for ensuring they comply with the law and are best placed to assess this when considering their specific products, procedures and operations.

## **7) Distributor responsibilities**

7.1 The GPSR places obligations on distributors of products. The definition of a distributor is set out in regulation 2 of the GPSR.

7.2 Distributors are required to act with due care to help ensure only safe products are supplied on the market. Distributors must not supply products that they know or ought to know to be dangerous. For example, if a product has been subject to a recall, or if they are notified of a safety concern by a producer, distributors must not supply any such products they may still have in stock.



7.3 Distributors must also cooperate with enforcement authorities at their request. This includes providing information they hold relating to risks posed by the product and enabling the product's identity and origin to be traced. Distributors must take appropriate action to remove the risk from consumers such as withdrawing dangerous products from the market and participating in any corrective action or recall activities.

7.4 Where the distributor knows that a product they have placed on the market or supplied poses risks to the consumer that are incompatible with the general safety requirement in the GPSR, they must notify the producer and the relevant authority in writing about the risks and the action being taken to prevent risks to the consumer.

7.5 OPSS has published [guidance on completing notifications to enforcement authorities regarding product safety risks](https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products) (<https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products>).

## **8) Product safety assessment: demonstrating protections against thermal runaway (Distributors)**

8.1 These guidelines do not specify the routes distributors must take. Businesses are responsible for ensuring they comply with the law, and are best placed to assess this when considering the products they supply, their procedures and operations.

8.2 However, distributors should consider the following steps:

- Obtaining information from producers and sellers confirming that a battery meets the requirements to protect against thermal runaway or the causes of thermal runaway, which are set out in relevant standards or using the latest technologies.
- Ensuring that products they distribute possess the relevant information in instructions and/or markings, as set out in section 4.7.
- Putting in place any assurance procedures they deem necessary to confirm the substance and/or accuracy of technical information supplied by producers.

8.3 Distributors should assure themselves, before making a lithium-ion battery available on the market, that the product is compliant and meets the requirements of the GPSR.

## **9) Legal requirements**

9.1 The GPSR provides the basis for the safety of consumer products by setting out safety requirements and obligations that businesses must meet.

9.2 The legal basis for issuing these guidelines is regulation 6(3)(c) of the GPSR as it applies in GB, which makes provision for the Secretary of State to set guidelines on assessing a specific product's safety for the purposes of GPSR.

9.3 These guidelines must be taken into account by businesses in assessing whether lithium-ion batteries for e-bikes and e-bike conversion kits meet the requirements of GPSR as they apply in GB.

9.4 Where businesses involved in the production or distribution of products in scope of these guidelines do not take account of them when placing such products on the market, they will be in breach of their responsibilities under the GPSR.

9.5 In addition, following these guidelines is strongly recommended for businesses producing or distributing such products placed on the Northern Ireland market.

## **10) Non-compliance with the regulatory requirements**

10.1 OPSS and Local Authorities have powers to enforce the requirements in the GPSR, including the requirement for products to be safe.

10.2 If investigations identify non-compliance with the GPSR, authorities will be able to take action against producers and distributors, which could require businesses to recall products from consumers, suspend supply of products, warn customers about risks, or withdraw products from sale. Additionally, where non-compliant products are identified at the border, they may be prevented from entry.

10.3 Producers and distributors are required to cooperate with enforcement authority requests in relation to action taken to mitigate risks posed to consumers by a product, including providing information and documentation upon request.

10.4 Where businesses breach certain obligations under GPSR, and it is appropriate and proportionate to the circumstances of the breach, enforcement authorities may initiate prosecution proceedings and, if found guilty of an offence, the person or persons responsible could face an imprisonment sentence and/or financial penalty.

## **11) Further information**



Voluntary standards can often help **Page 111**ers to meet legal requirements. To find out more about the standards that apply to e-bikes and their batteries, please refer to:

- BS EN 50604-1:2016+A1:2021 – Secondary lithium batteries for light EV (electric vehicle) applications – Part 1: General safety requirements and test methods
- BS EN 15194:2017+A1:2023 for Electrically power assisted cycles – Designated to provide a presumption of conformity under the Supply of Machinery (Safety) Regulations 2008.

For more information on bringing safe products to market and undertaking product recalls and other corrective actions, please refer to the free PAS documents on the BSI website:

- [PAS 7050:2022 Bringing Safe Products to the Market](https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7050-bringing-safe-products-to-the-market-code-of-practice/)  
(<https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7050-bringing-safe-products-to-the-market-code-of-practice/>)
- [PAS 7100:2022 Product Recall and Corrective Actions](https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7100-product-recall-and-other-corrective-actions-code-of-practice/)  
(<https://www.bsigroup.com/en-GB/insights-and-media/insights/brochures/pas-7100-product-recall-and-other-corrective-actions-code-of-practice/>)

For further information on the General Product Safety Regulations 2005, as they apply in Great Britain, please refer to:

- [General Product Safety Regulations 2005](https://www.legislation.gov.uk/ukxi/2005/1803/contents)  
(<https://www.legislation.gov.uk/ukxi/2005/1803/contents>) – legislation.gov.uk
- [Guidance on the General Product Safety Regulations 2005](https://www.gov.uk/government/publications/general-product-safety-regulations-2005/general-product-safety-regulations-2005-great-britain)  
(<https://www.gov.uk/government/publications/general-product-safety-regulations-2005/general-product-safety-regulations-2005-great-britain>)

For further information on completing statutory notifications where products have been identified as unsafe or non-compliant, please refer to:

- [Business notifications of unsafe and noncompliant products](https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products)  
(<https://www.gov.uk/government/publications/business-notifications-of-unsafe-and-noncompliant-products>)

For information about OPSS' approach to delivering regulation, please refer to:

- [OPSS Enforcement Policy](https://www.gov.uk/government/publications/safety-and-standards-enforcement-enforcement-policy/opss-enforcement-policy) (<https://www.gov.uk/government/publications/safety-and-standards-enforcement-enforcement-policy/opss-enforcement-policy>)

Enquiries in relation to this guidance should be directed to:  
[opss.enquiries@businessandtrade.gov.uk](mailto:opss.enquiries@businessandtrade.gov.uk).



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## **Cheltenham Borough Council**

### **Cabinet Housing Committee – 21<sup>st</sup> January 2026**

## **Q3 2025/26 Housing Complaints and Compliments Report**

#### **Accountable member:**

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

#### **Accountable officer:**

Caroline Walker, Director of Housing, Customer Services and Communities

#### **Executive summary:**

This report provides an overview of housing related complaints and compliments received during Q3 for 2025/26. It highlights key themes, performance against targets, and actions being taken to improve service delivery and customer satisfaction

#### **Recommendations:**

1. That the report and next steps are noted by Cabinet Housing Committee.

### **1. Background**

The Council is committed to providing high-quality housing services and maintaining transparent and effective complaint-handling processes in line with the Housing Ombudsman's Complaint Handling Code.

Each quarter, the Housing Service monitors complaints and compliments to identify trends, recurring issues, and areas for improvement. This ensures that feedback from residents directly informs service development and performance management.

During Q3 2025/26, the Council continued to focus on embedding the principles of good complaint handling, fairness and accessibility.

### **2. Main content**

It is positive and reassuring to see that over the last three quarters, the complaints team has been able to gradually reduce the average number of days taken to respond to complaints. This has decreased from 16.3 days at the beginning of the year to an average of 12.8 days by the end of this quarter.

Service delays and contractor issues were the main reasons for complaints this quarter. This trend was clearly noticeable to the complaints team, with complaints arising from external contractors being the most common cause across all three months. The service is addressing this concern through regular meetings, process reviews and contractor collaboration to ensure clearer, more consistent communication with tenants.

### 3. Performance Overview

Category	Q1 2025/26	Q2 2025/26	Q3 2025/26
Stage 1 complaints	66	84	71
Stage 2 complaints	10	6	8
% of Stage 1 complaints upheld (in full/part)	68%	86.4%	93.0%
Average Days to respond to Stage 1 complaints	16.3	12.9	12.8
Compliments received	26	20	10

### 4. Key risks

Failure to comply with the Housing Ombudsman Complaint Handling Code and the Council housing complaints policy and manage the complaints process appropriately may result in:

- A maladministration decision from the Housing Ombudsman and include Ombudsman intervention and financial penalty
- Reputational damage and loss of public confidence
- Reduced tenant satisfaction and engagement.

#### Report author:

Caroline Walker, Director of Housing, Customer Services and Communities,  
[caroline.walker@cheltenham.gov.uk](mailto:caroline.walker@cheltenham.gov.uk)

#### Appendices:

- 1 Risk Assessment
- 2 Q3 2025/26 Housing Complaints and Compliments report

## Appendix 1: Risk Assessment

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	<p>Maladministration decision from Housing Ombudsman</p> <p>Reputational damage arising from a complaint</p>	Caroline Walker, Director of Housing, Customer Service and Communities	4	3	12	Reduce the risk	<p>Complete annually the Housing Ombudsman Self-assessment form</p> <p>Ensure compliance with CBC Housing complaints policy and the Housing Ombudsman Complaints handling Code</p> <p>Ensure Complaints are managed professionally, fairly and within target timescale</p>	Natasha Dhillon, Complaints Officer	<p>Annually</p> <p>Every 3 years or more frequently any legislative changes</p>

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# Housing Complaints and Compliments Report

Q3 October to December 25/26

Natasha Dhillon, Complaints Officer

[natasha.dhillon@cheltenham.gov.uk](mailto:natasha.dhillon@cheltenham.gov.uk)

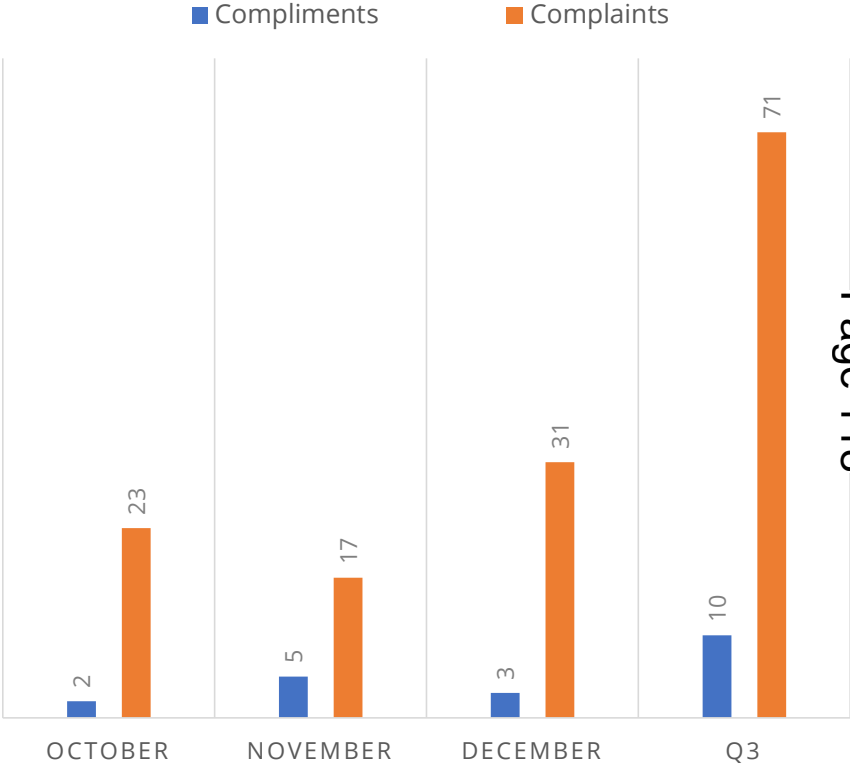
In this period:

STAGE 1	Compliments	Complaints Opened	Complaints responded to
October	2	27 (1 Withdrawn)	23
November	5	18	17
December	3	31 (1 withdrawn, 12 open complaints)	31
STAGE 2	Complaints Opened		Complaints responded to
October	3		3
November	2		3
December	3		2

In Quarter 3 of 2025/26, 76 complaints were opened at Stage 1. Of these, 2 were subsequently withdrawn due to no tenant contact, and 12 remain open. During the quarter, responses were issued for 71 Stage 1 complaints and 8 Stage 2 complaints. Overall complaint volumes reduced from 84 in Quarter 2 to 71 in Quarter 3, indicating a positive downward trend.

While Stage 1 complaint levels have remained broadly steady, there was an increase in Stage 2 complaints from 6 to 8 compared with the previous quarter, reflecting a small rise in escalations. This increase is linked to a known issue relating to kitchen installations, which is currently being addressed.

OCTOBER - DECEMBER 2025



The period for this report is between 01/10/2025 00:00:00 – 31/12/2025 23:59:59 (inclusive)

### Q3 OVERVIEW STAGE 1: October to December 2025/26

76 complaints were opened in Q3, October to December 2025 and 71 complaints were responded to. 46 out of the 71 complaints responded to were within 10 working days (65%), and all of these were responded to within their target date.

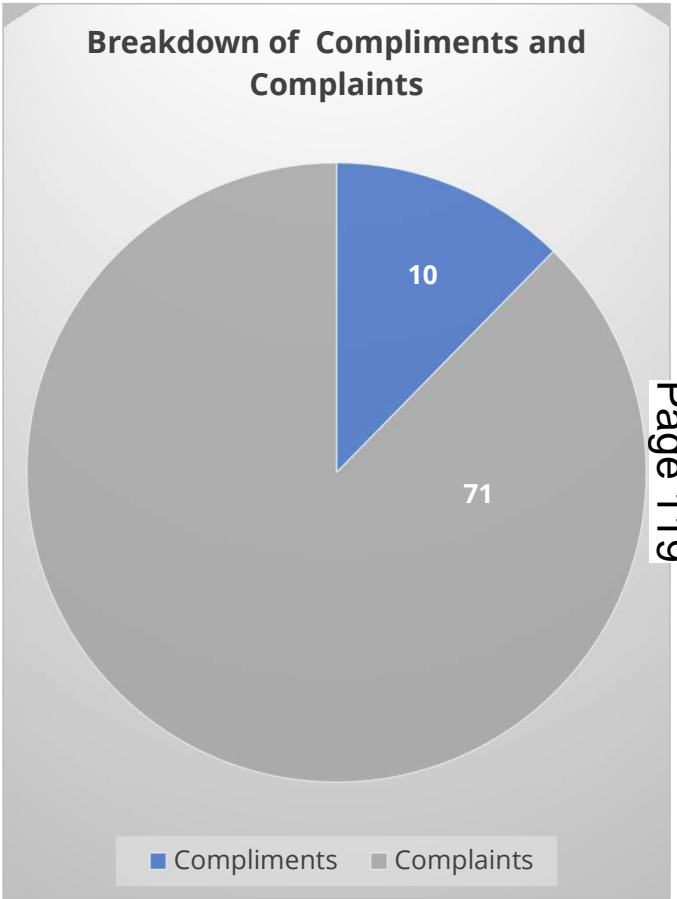
25 out of 71 complaints (35%) had agreed Stage 1 extensions and were responded to within timescales.

The average number of days taken to investigate all closed complaints was 12.8 days. 25 complaints had formal extensions agreed with the complainant, in line with the Housing Ombudsman code. Some of these had extensions over an extended period of time due to a lack of resource in the building services team. The average time to respond to complaints without extensions was 7.5 days.

Compensation: Of the 71 stage 1 responses sent, 9 of these were offered compensation (12%).

CBC declined five complaints in Q2, these complaints were responded to initially via a phone call if possible and all by letter to advise why the complaint was not accepted in line with our complaints policy.

UPHELD	PARTLY UPHELD	NOT UPHELD
56	10	5



## Q3 OVERVIEW Stage 2: October to December 2025/26

Number of complaints escalated to Stage 2: In this period 8 complaints were escalated to Stage 2. 8 complaints were responded to at Stage 2 and all complaints were responded to within their agreed target date with any agreed extensions

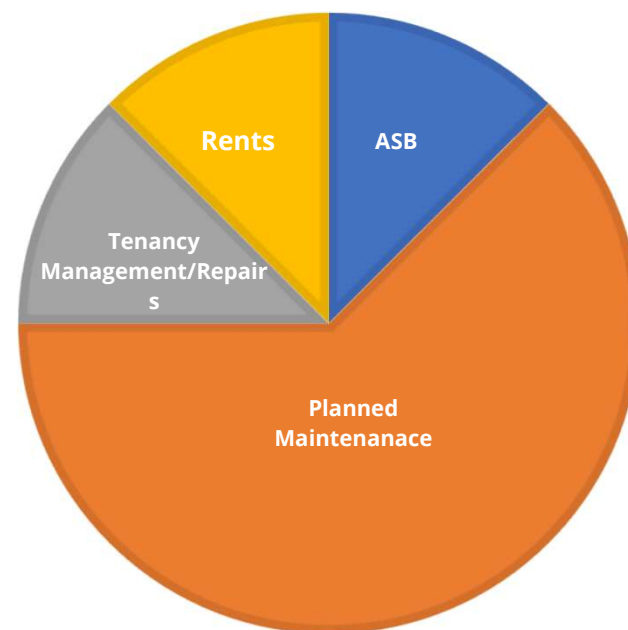
RESOLVED AT STAGE 2	ESCALATED TO OMBUDSMAN	UPHELD	PARTLY UPHELD	NOT UPHELD
8	Not Confirmed	7	0	1

Stage 2 complaints increased from 6 in Quarter 2 to 8 in Quarter 3. This rise is linked to issues arising from kitchen installations carried out by our contractors. We are aware of this increase and are monitoring the situation closely to address the underlying causes and reduce further escalations.

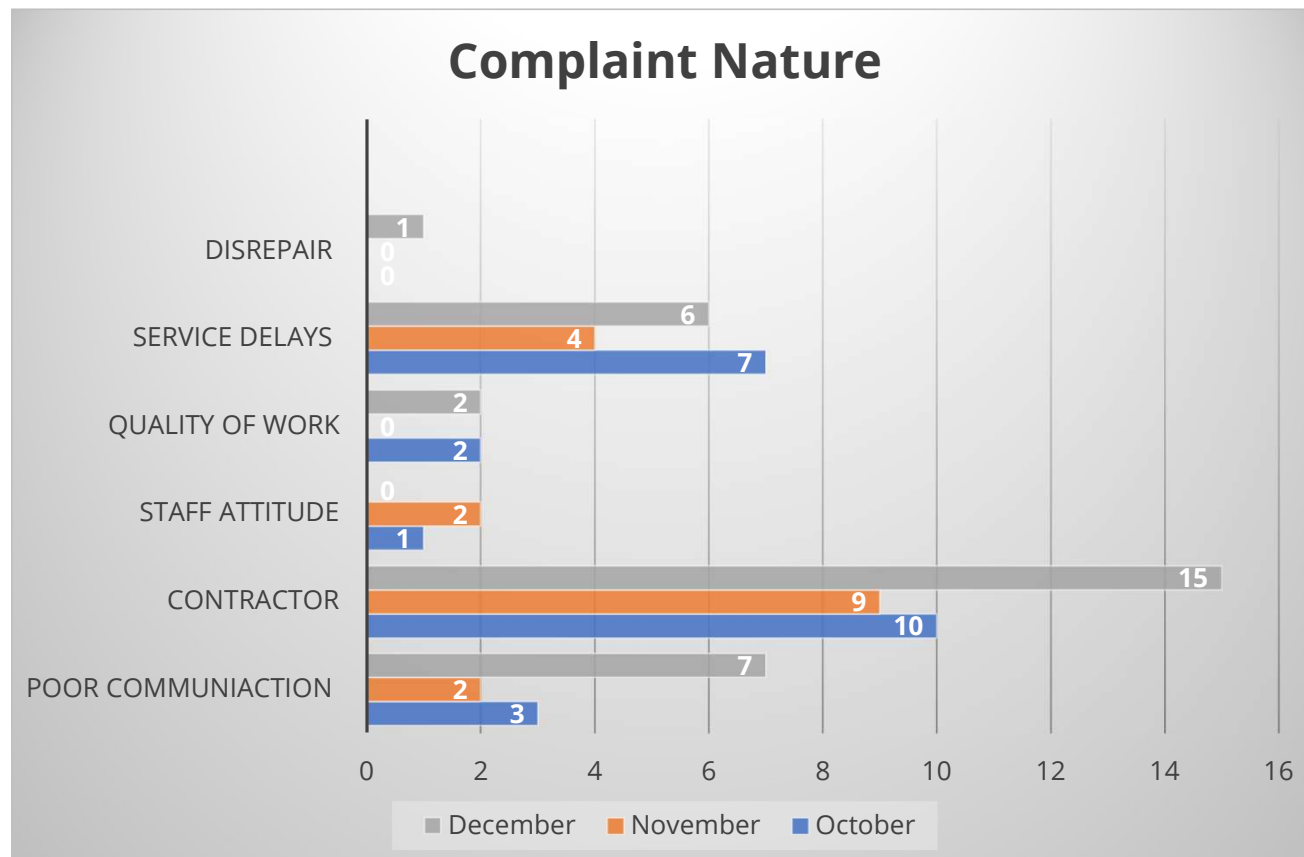
The Complaints Team has met with our contractors and their appointed maintenance operations manager on a weekly basis over the past two months to monitor progress and address current issues through to completion. In addition, CBC has temporarily halted the opening of any new kitchen installations until outstanding kitchens have been completed to tenant satisfaction.

## BREAKDOWN OF STAGE 2 COMPLAINTS ESCALATED IN THE PERIOD BY SERVICE AREA

- ASB
- Planned Maintenance
- Tenancy Management/Repairs
- Rents



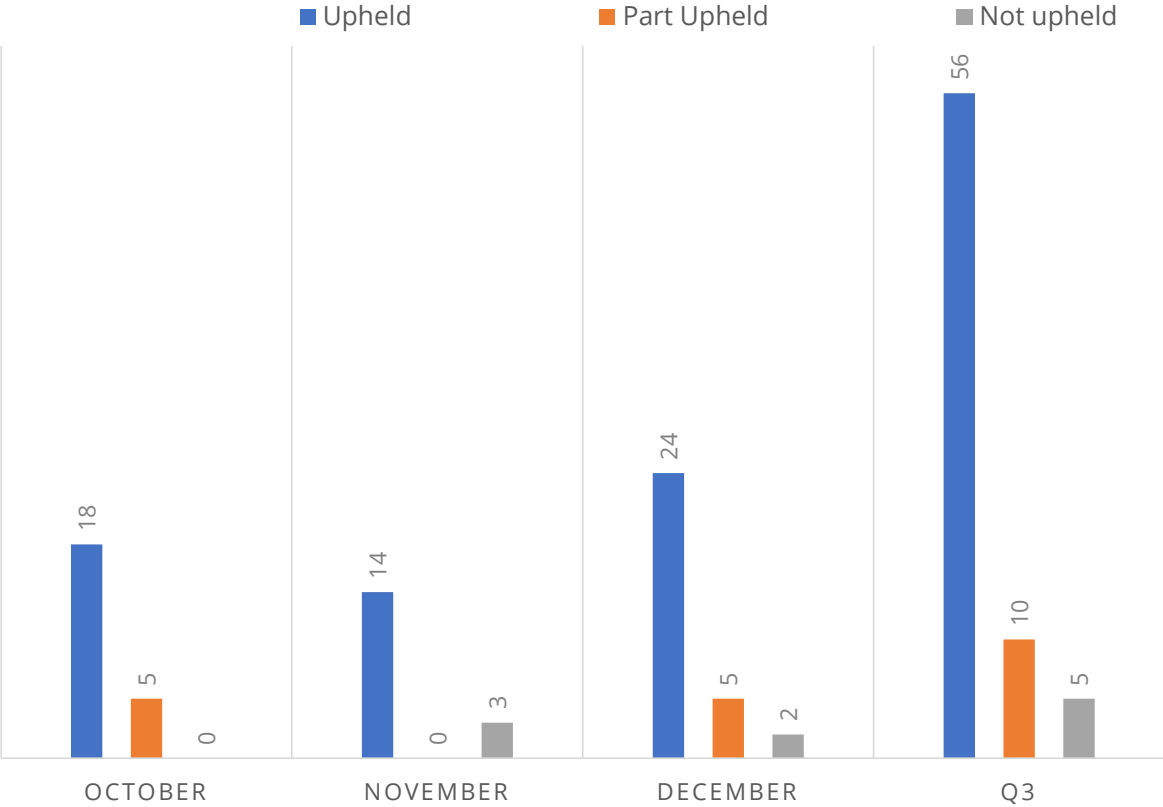
## Breakdown of Complaint Nature for complaints responded to



The majority of complaints relate to contractor performance, frequently followed by service delays, with the two issues closely linked. Complaint handling during this period shows a consistent influx of cases associated with contractors, largely arising from the ongoing kitchen installation programme and also notably outdoor buildings such as shed and garages.

Overall, the data highlights contractor performance, service delays, and communication as the key drivers of complaints, with an increase particularly evident towards the end of the year.

# Complaint Outcomes

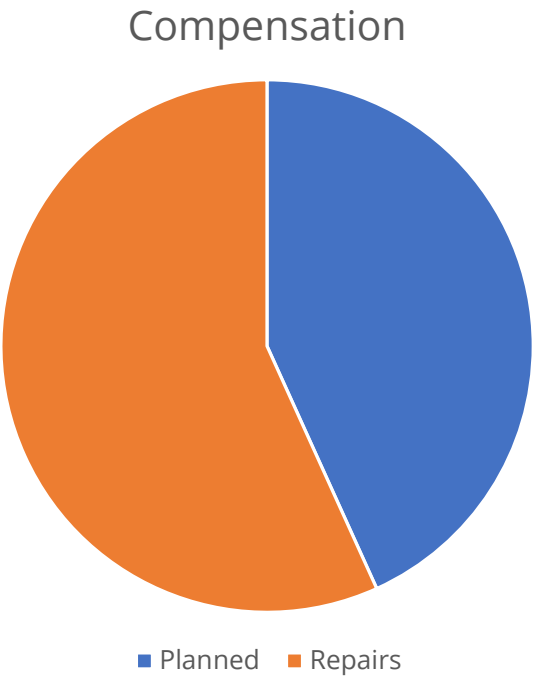


The chart shows that the majority of complaints in Quarter 3 were upheld, with outcomes increasing steadily across October, November, and December, culminating in a total of 56 upheld complaints for the quarter.

A smaller proportion of complaints were partially upheld (10), while not upheld outcomes remained low overall (5).

Compared with the previous quarter, Quarter 3 reflects a higher number of upheld outcomes, indicating improved complaint investigation and clearer identification of service failings.

Complaints Compensation – Paid out Q3



There were two Stage 2 compensation figures included in this quarter, which accounts for the slightly higher payments. It is also noted that many of the planned compensation payments relate to the kitchen installation programme which have seen compensation payments to 23 out of 25 complaints.

Month	Amount	Department	Total
October	£100 £250 £202.73  £25	Planned Planned Planned  Planned	£100 £250 £100– Contractor, £152.73 CBC £25 <b>£577.73</b>
November	£4000 (stage 2) £250 £75 £249 £304.80 £100	Repairs Repairs Planned Planned Repairs Planned Planned	£4000 £250 £75 £249.09 £304.80 £100 <b>£4,978.89</b>
December	£500 £1330.62 (stage 2) £100	Planned Planned Planned	£500 Contractor £1330.62 £100 <b>£1,930.62</b>
Total			<b>£7,487.24</b>

Complainant Profile

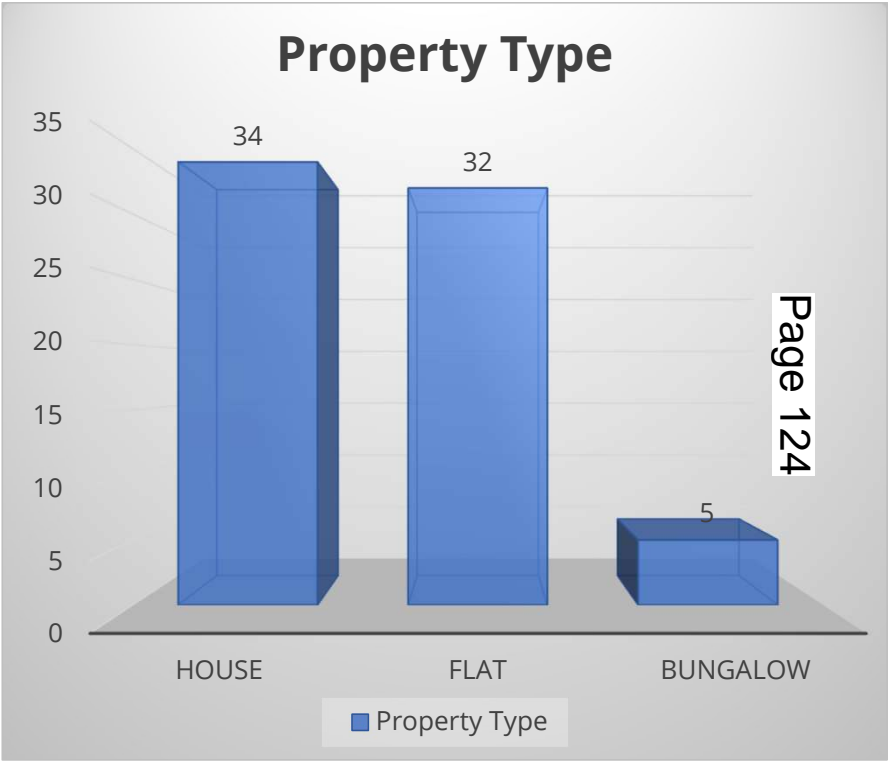
Property Type (Stage 1 complaints responded to)

Age Category	Total
No Age Data	2.1%
16-24	2.1%
25-34	27.1%
35-44	22.9%
45-54	18.8%
55-64	14.6%
65-74	4.2%
75-84	4.2%
85+	4.2%
Total	100%

Ethnic Origin	Total
White British	70.8%
No Data	6.3%
Other Ethnic Group	6.3%
White Other	10.4%
No Answer	2.1%
Black or Black British Caribbean	2.1%
Black or Black British African	2.1%
Total	100%

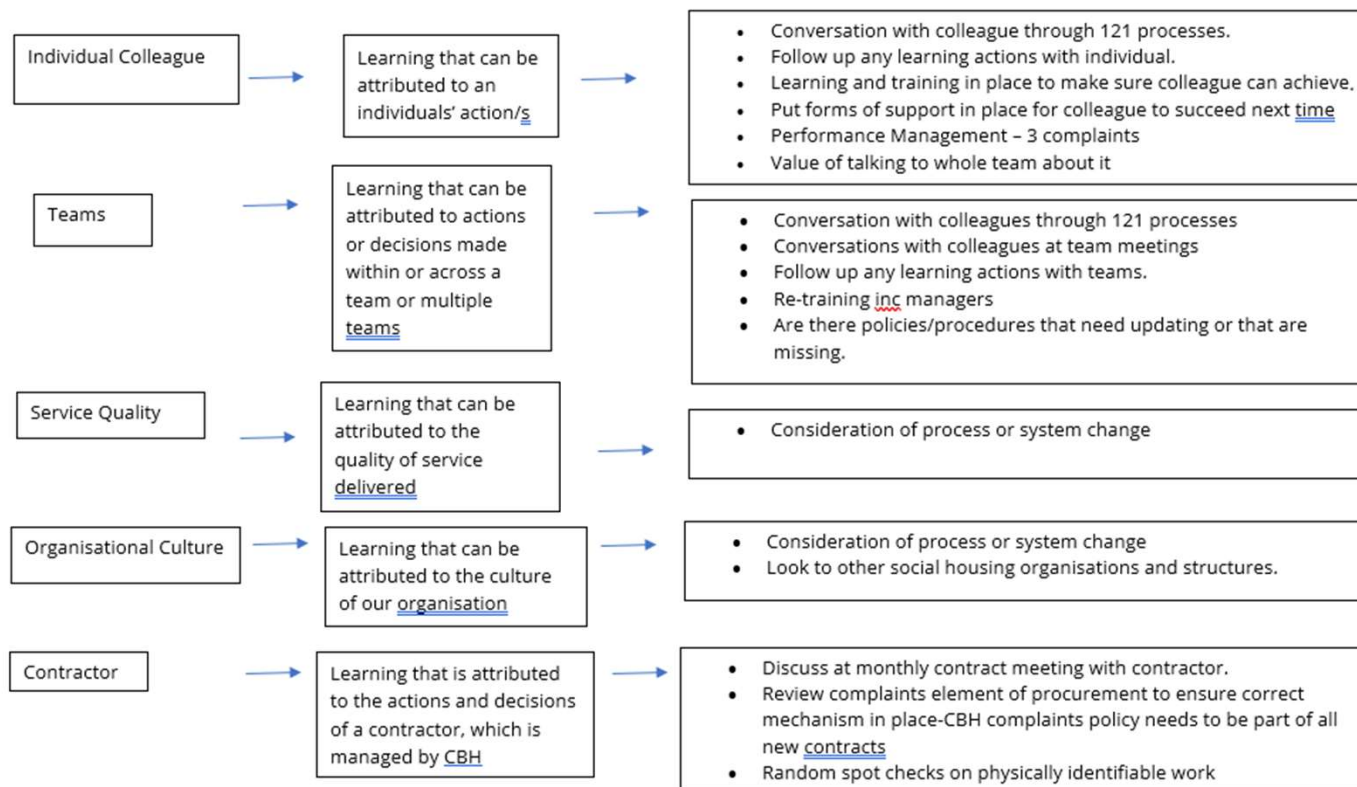
Disability Flag	Total
Disabled	16.7%
Not Disabled	81.3%
No Data	2.1%
Total	100%

Gender	Total
No Data	2.1%
Female	75%
Male	22.9%
Total	100%





## LEARNING FRAMEWORK



CBC Housing Services developed and implemented a learning framework to aid Investigating Officers in identifying meaningful 'lessons learnt' from complaints, and to guide them in implementing appropriate actions.

This has been shared with all investigating officers and will be monitored by the Complaints Officer.

The framework has been embedded into the QL complaints case module for reporting purposes.

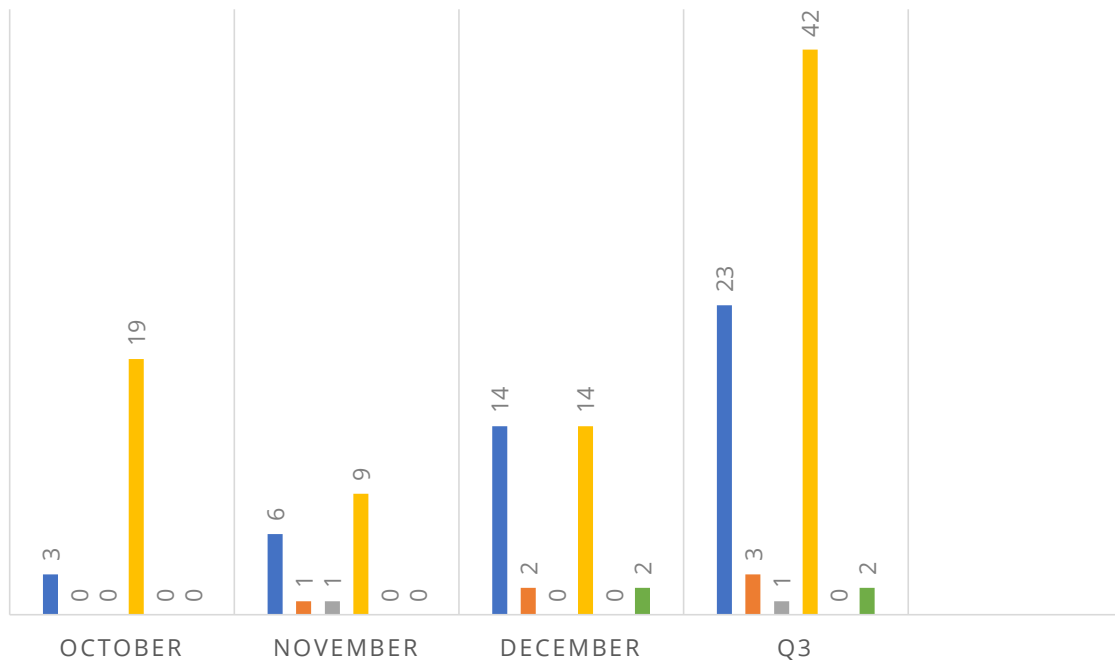
## LEARNING FRAMEWORK

Area	Learning Summary	Actions / Considerations
<b>Individual Colleague</b>	Learning that can be attributed to an individuals' action/s	<ul style="list-style-type: none"> <li>• Conversation with colleague through 121 processes</li> <li>• Follow up any learning actions with individual</li> <li>• Learning and training in place to make sure colleague can achieve</li> <li>• Put forms of support in place for colleague to succeed next time</li> <li>• Performance Management – 3 complaints</li> <li>• Value of talking to whole team about it</li> </ul>
<b>Teams</b>	Learning that can be attributed to actions or decisions made within or across a team or multiple teams	<ul style="list-style-type: none"> <li>• Conversation with colleagues through 121 processes</li> <li>• Conversations with colleagues at team meetings</li> <li>• Follow up any learning actions with teams</li> <li>• Re-training inc managers</li> <li>• Are there policies/procedures that need updating or that are missing</li> </ul>
<b>Service Quality</b>	Learning that can be attributed to the quality of service delivered	<ul style="list-style-type: none"> <li>• Consideration of process or system change</li> </ul>
<b>Organisational Culture</b>	Learning that can be attributed to the culture of our organisation	<ul style="list-style-type: none"> <li>• Consideration of process or system change</li> <li>• Look to other social housing organisations and structures</li> </ul>
<b>Contractor</b>	Learning that is attributed to the actions and decisions of a contractor, which is managed by CBC	<ul style="list-style-type: none"> <li>• Discuss at monthly contract meeting with contractor</li> <li>• Review complaints element of procurement to ensure correct mechanism in place – CBH complaints policy needs to be part of all new contracts</li> <li>• Random spot checks on physically identifiable work</li> </ul>

## LEARNING FROM COMPLAINTS – Q3 - October to December

### LEARNING FRAMEWORK

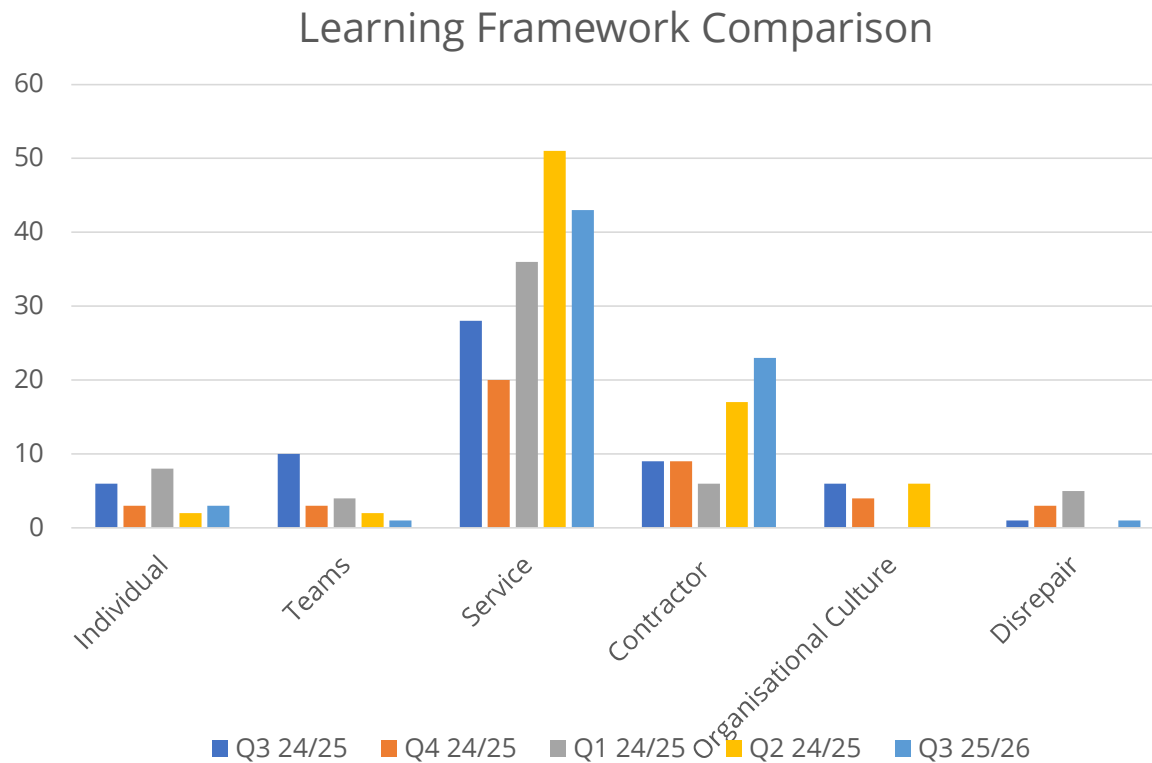
■ Contractor ■ Individual ■ Teams ■ Service ■ Organisational Culture ■ Disrepair



The majority of complaints clearly point to challenges related to service delivery and contractor performance. This insight is relevant not only to CBC's internal operations but also to the work carried out by external contractors, emphasising the importance of ongoing efforts to enhance consistency and accountability in everything we provide to our tenants.

On a positive note, the relatively few complaints about individual conduct indicate that both staff and contractors are generally upholding a professional and respectful standard in their dealings with tenants.

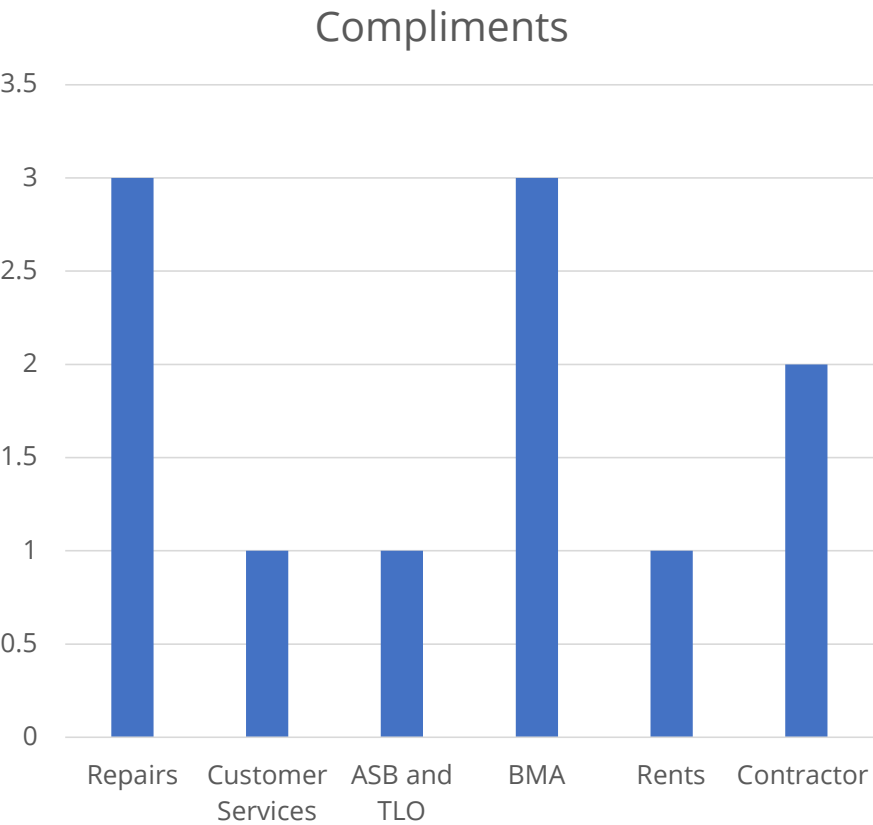
## LEARNING FRAMEWORK COMPARISON



This chart shows that Service and Contractor complaints that derive from the learning framework consistently gain the highest number of complaints across the last four quarters. Other frameworks such as Individual, Teams, Organisational Culture, and Disrepair recorded relatively low and stable complaint levels throughout the last four quarters.

The Complaints Team have investigated the higher number of complaints from quarters 1 and 2 related to services from building services complaints as this is where the majority of complaints originate. They will conduct a similar review for quarter 3 and share the findings with service leaders to ensure appropriate improvements are made

Compliments - Q3 October – December



I have just spoken to your tenant, and they were so thankful for all your help and support with this case.

Tenant wanted to say how lovely everyone was who was involved in the installation of her new extractor fan.

Tenant called to pass on her many thanks to the trade for looking at her handrail. Absolutely fantastic work and very polite  
Thank you for all your help these last 12 months, you have made a big difference and improvement to my way of life, much appreciated.

I am so touched by how supportive everyone has been. I'd like to take the chance to say thank you to you, it has really eased my stress knowing that there are such understanding and supportive people on your team. Everyone struggles at times and being a single working mother is very hard at the moment. Especially with the car problems. But I feel now it's getting better now I have spoken to you both about my situation.

## IN THE LAST 3 MONTHS

- Meetings were held with the planned maintenance team and contractors in response to the increased number of complaints associated with the kitchen installation programme
- Implemented a standardised procedure for investigating Kitchen and Bathroom complaints
- Conducted a complaints feedback focus group
- Completed learning for Quarter 1 and 2 for Building Services
- Attended HQN mock inspection for Consumer Standards

## NEXT STEPS

- Collaborate with relevant service areas to improve complaint response times and ensure commitments are fulfilled, complaint promises.
- Complete learning for Quarter 1 and 2 for Community and Housing Services
- Continue to work with Planned Operations Manager to improve contractor performance for kitchen installation

## **Cheltenham Borough Council**

### **Cabinet Housing Committee – 21 January 2026**

### **Anti-Social Behaviour Improvement Programme Update**

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#### **Accountable member:**

Cllr Flo Clucas, Cabinet Member for Housing and Customer Services

#### **Accountable officer:**

Caroline Walker, Director of Housing, Communities & Customer Service

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#### **Executive summary:**

The purpose of this report is to provide an update to Cabinet Housing Committee regarding improvement to the Housing ASB Service. This update outlines progress since the previous report to committee in February 2025, and approval of the revised Housing ASB Policy in June 2025.

The report also provides an update on the Housing ASB Team and provides an overview of team activity during 2025 (Appendix 1).

#### **Recommendations:**

1. For committee to note the report
- 

## **1 Background**

1.1 As outlined in the report provided to committee in February 2025 the foundations of improvements to ASB service are our compliance with the Regulator of Social Housing Consumer standards.

1.2 The Neighbourhood and Community Standard require us to work in partnership as a local authority, as well as with the police and other relevant organisations to deter and ASB and hate incidents in the neighbourhoods where we provide social housing.

1.3 The Tenancy Standard requires us to provide services that support tenants to maintain their tenancy and prevent unnecessary evictions.

1.4 The Transparency, Influence and Accountability Standard require us to be open with tenants and treat them with fairness and respect so they can access services, raise concerns, when necessary, influence decision making and hold their landlord to account.

### **1.5 Housing ASB Team Update**

1.6 In September 2025, resources within the ASB team were reviewed, with Cassie Biggs joining the team following the completion of her ASB & community safety apprenticeship.

1.7 This review has enabled a rearrangement of officer 'patches' which went live on 1<sup>st</sup> December 2025. These 'patches' have been aligned with the 'patches' of Tenancy Management Officers, as well as the key locations in which our Tenancy Investment and Community Investment Officers are working. This has enabled 'area teams' that can collaborate and support each other and our tenants to sustain their tenancies and address key community issues such as social isolation and youth criminal exploitation.

1.8 A reduction in 'patch' size also enables officers to spend more time in their communities, working proactively to prevent and address ASB and to engage with our partners to develop multi-agency responses to concerns around ASB and criminality, with the benefit of this approach being clearly evident in work carried out with Police at Edward Wilson House during 2025 to address and resolve persistent offenders and build trust with tenants at the location.

1.9 The Housing ASB Team continue to work closely with their Tenancy investment colleagues, who during 2025 have focused their efforts around supporting ASB Officer casework by supporting long term solutions to anti-social behaviour, particularly where factors such as mental health or substance misuse or domestic abuse are present.

1.10 Throughout the last year the ASB and Tenancy Investment Team have continued to work closely with both statutory and third sector partners and have developed closer links with Social Prescribing teams working in GP surgeries across Cheltenham, to enable proactive work with tenants that are open to both services.

1.11 During 2026 members of the team will be studying for Housing Certificates with the Chartered Institute of Housing to develop their wider housing knowledge, and to ensure we are compliant with the professionalisation requirements of the consumer standards.

### **1.12 Consumer Standards Compliance**

1.13 Compliance with the standards centred around a review of the Housing ASB Policy, incorporating consultation with both customers and key stakeholders. That revised policy has been approved at committee and cabinet and published on our website.

1.14 As part of our wider consumer standards compliance project, the Tenancy Services Manager has taken ownership of the Neighbourhood and Community Standard action plan,



in which 11 actions relating to ASB compliance have been identified from multi-team workshops. Work is in progress to complete these actions ahead of a mock inspection in February 2026.

1.15 A key aspect of compliance is capturing the voice of our tenants. In line with this the ASB Team are initiating community drop in sessions in our communities to enable our tenant's easy access to our services, and for the officers to share key aspects of our services with them. A St Paul's drop-in session commences in January, with another drop in featuring staff from our ASB, Tenancy Management, Tenancy Investment and Benefit and Money Advice Teams located at Hesters Way Community Resource Centre commencing later in quarter four of this financial year.

#### 1.16 **Communications**

1.17 Following the approval of the revised Housing ASB Policy, communicating key aspects of ASB and how we can address this with our tenants and other key stakeholders has been planned. As shown in Appendix 1, noise related ASB is the most prevalent category of ASB, so this is the initial focus for communication. An article outlining our approach to reports of noise nuisance and providing 'top tips' to prevent nuisance will be published in the next issue of Tenant Voice, with linked social media posts to sit alongside it to reach the widest possible audience.

1.18 Further communication campaigns linked to our most prevalent ASB categories are planned for future issues of Tenant Voice, as well as plans for joint communications campaigns with our partners at Gloucestershire Constabulary and Gloucester Fire & Rescue in relation to the use and safe storage of Ebikes and Scooters.

#### 1.19 **Enforcement around key concerns**

1.20 There are shared concerns across agencies working across Cheltenham around the illegal use of E-bikes and scooters, in terms of them being illegally ridden on highways, their use in the commission of criminal offences, and concerns regarding modification and unsafe charging practices.

1.21 In Spring 2024 we experienced a fire in a town centre flat linked to the charging of E-bikes / scooters and works being carried out on them. The tenant of that flat was rehoused at another location, with an agreement in place that these practices would not continue. Unfortunately, the tenant did not keep to this agreement, and a further fire was narrowly avoided. In response to this the Housing ASB Team secured a civil injunction against the tenant which provides an ongoing power of entry to check that no lithium-ion batteries or vehicles containing this batteries are being stored at the location. The tenant and location remain under close monitoring.

#### 1.22 **ASB Satisfaction feedback**

1.23 Tenant satisfaction with our ASB services was reported in line with our wider Tenant Satisfaction Measures submission for 2024/25. The level of satisfaction with the council's

approach to dealing with ASB was 63%. This places our service in the upper second quartile when compared with all registered providers and in the upper quartile when compared against other councils.

1.24 Tenant response to our satisfaction surveys remains at the same level as reported a year ago. To increase responses to this, a financial incentive, in the form a quarterly voucher draw will be offered from quarter 1 2026/27 onwards.

1.25 Further to this, the Housing ASB Team have access to administrative support following the recruitment of a Community Services Assistant in Autumn 2025, and we will be working with this colleague to make direct calls to those tenants who do not respond to our automated survey, in order to increase the level and quality of our feedback, and also seek tenant engagement in quarterly focus groups commencing from quarter 1 2026/27.

1.26 The benefits of feeding back to us on our service will also form part of future social media communications.

#### 1.27 **Next Steps**

- Commencement of drop-in sessions in St Paul's and Hesters Way (Q4 2025/26) & development of an Oakley area ASB drop in (Q1 2026/27).
- Commencement of quarterly ASB service user focus groups (Q1 2026/27)
- Implementation of customer feedback follow up and linked incentives (Q1 2026/27)
- Agree a communication timetable for 2026/27 (Q4 2025/26)

## 2 **Key risks**

N/A

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### **Report author:**

Nick Such, Tenancy Services Manager, [Nicholas.Such@cheltenham.gov.uk](mailto:Nicholas.Such@cheltenham.gov.uk)

### **Appendices:**

1. Risk Assessment
2. ASB – 2025 in numbers

**Appendix 1: Risk Assessment**

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
CH6	Housing Regulatory & Legal Requirements – If we fail to meet regulatory and legal requirements, specifically the Regulator for Social Housing consumer standards and the Housing Ombudsman Complaints Handling Code then this may result in intervention and reputational damage.	Claire Hughes	4	3	12	Reduce the risk	- Effective oversight of regulatory performance by senior officers, Cabinet and Housing cabinet committee. -Delivery of Improvement Plan.	Nick Such	Quarterly
CH5	Tenant Satisfaction - If there is a decline in the quality of services delivered to tenant's, then this may result in reduction in customer satisfaction (evidenced through the TSMs) affecting the quality of	Caroline Walker	4	3	12	Reduce the risk	- Effective oversight of service delivery performance by senior officers, Cabinet and Housing cabinet committee. - Review and monitoring of service	Caroline Walker	Quarterly

Risk ref	Risk description	Risk owner	Impact score (1-5)	Likelihood score (1-5)	Initial raw risk score (1 - 25)	Risk response	Controls / Mitigating actions	Control / Action owner	Deadline for controls/ actions
	life experienced by residents in Cheltenham and leading to referral to the Housing Ombudsman and/or Regulator for Social Housing.						standards. - Effective tenant voice and listening and acting on tenant feedback. - Learning from complaints. - Review of national TSM data		

## Contacts

### Incoming ASB reports

2,619 contacts from 819 tenancies

### ASB Officer generated contacts

1,784 contacts from 542 tenancies

### Total

4,403 contacts

## Cases

57 ASB cases opened



39 Tenancy Investment cases opened



## Legal & Enforcement



11 legal cases



2 ASB evictions



6 closure orders



11 ASB Injunctions



1 Undertaking

## Team Developments

- Additional ASB Officer recruited following successful apprenticeship
- Officer 'patches' redrawn & relaunched
- Use of community protection warnings & notices
- Enforcement around E-bike safety

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## **Tenant Engagement Update, Housing Services, Cheltenham Borough Council January 2026**

### **Staffing Update**

Liam Pem, Resident Engagement Officer, has now left CBC Housing to pursue an alternative career path. The post has been advertised, and shortlisting is scheduled to take place this week.

### **Tenant Panel**

The December Tenant Panel meeting was cancelled due to staff illness. The next meeting is scheduled for 16 January, at which point the panel will be finalising the most recent scrutiny review.

### **Leaseholder Forum**

Going forward, it is proposed that four Leaseholder Panel meetings will be held annually. These sessions will adopt a “Scrutiny Bootcamp” approach, focusing on in-depth examination of specific services with a view to producing recommendations in the session.

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Meeting		Title	Objective	Format
25th March 2026	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>	<p>CEO/Director Briefing (if required) (Verbal)</p> <p>Housing Asset Management Strategy</p> <p>Leaseholder Repairs and Charges Policy</p> <p>Housing Improvement Plan</p> <p>Counter Fraud and Enforcement Unit Report</p> <p>Housing Risk Register</p> <p>Updates from the Tenant and Leaseholder Panels</p> <p>Review of the Housing Committee Forward Plan</p> <p>Briefing Note - Housing Sector Insight</p>	<p>An update from the Chief Executive/Director on key issues which may be of interest to the Cabinet Housing Committee.</p> <p>To provide the committee with the Housing Asset Management Strategy for sign off and recommendation to cabinet for approval.</p> <p>To provide the committee with the Leaseholder Repairs and Charges Policy for sign off and recommendation to cabinet for approval.</p> <p>To provide the Committee with a progress update on the Improvement Plan developed to resolve areas of non-compliance with the Regulator of Social Housing's Consumer Standards.</p> <p>To provide the Committee with an overview of the Counter Fraud Enforcement Unit's work on housing and tenancy fraud over the previous year.</p> <p>To review the strategic risks relating to housing from the Council's Risk Register.</p> <p>To highlight the ongoing activities of the Tenant and Leaseholder Panels and provide an additional opportunity for tenant and leaseholder voices to be heard.</p> <p>To provide the Committee with opportunities to identify any additional areas they may wish to scrutinise.</p> <p>To provide the Committee with an overview of recent developments in the housing sector and provide opportunities for horizon scanning.</p>	<p>Verbal</p> <p>Decision</p> <p>Decision</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Briefing Note</p>
1st June 2026	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>	<p>CEO/Director Briefing (if required) (Verbal)</p> <p>Tenant Satisfaction Measures Submission 2025/26</p> <p>Housing Performance and Compliance Report - Quarter 4</p> <p>Housing Compliments and Complaints Report - Quarter 4</p> <p>Housing Services Health and Safety Report</p> <p>Updates from the Tenant and Leaseholder Panels</p> <p>Review of the Housing Committee Forward Plan</p> <p>Briefing Note - Housing Sector Insight</p>	<p>An update from the Chief Executive/Director on key issues which may be of interest to the Cabinet Housing Committee.</p> <p>To provide the committee with an opportunity to review the TSM submission for 2025/26</p> <p>To provide the Committee with key performance information relation to voids, arrears, day to day repairs, ASB and property compliance.</p> <p>To provide an overview of housing related complaints and compliments, identifying key areas of dissatisfaction and areas for learning and service improvement.</p> <p>To review health and safety activity that has been undertaken during the period, whether it was successful, and identify current tasks and challenges being faced.</p> <p>To highlight the ongoing activities of the Tenant and Leaseholder Panels and provide an additional opportunity for tenant and leaseholder voices to be heard.</p> <p>To provide the Committee with opportunities to identify any additional areas they may wish to scrutinise.</p> <p>To provide the Committee with an overview of recent developments in the housing sector and provide opportunities for horizon scanning.</p>	<p>Verbal</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Briefing Note</p>
29th July 2026	<ul style="list-style-type: none"> <li>•</li> <li>•</li> <li>•</li> <li>•</li> </ul>	<p>CEO/Director Briefing (if required) (Verbal)</p> <p>Housing Performance and Compliance Report - Quarter 1</p> <p>Housing Complaints and Compliments Report - Quarter 1</p> <p>Housing Services Health and Safety Report</p>	<p>An update from the Chief Executive/Director on key issues which may be of interest to the Cabinet Housing Committee.</p> <p>To provide the Committee with key performance information relation to voids, arrears, day to day repairs, ASB and property compliance.</p> <p>To provide an overview of housing related complaints and compliments, identifying key areas of dissatisfaction and areas for learning and service improvement.</p> <p>To review health and safety activity that has been undertaken during the period, whether it was successful, and identify current tasks and challenges being faced.</p>	<p>Verbal</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p> <p>Information/Discussion Paper</p>

	•	End of Year 2025-26 Housing Revenue Account (HRA) Budget Monitoring Report	To provide a monitoring position statement for the HRA against the budget approved by Council on 21 February 2025, highlighting any key variances.	Information/Discussion Paper
	•	Updates from the Tenant and Leaseholder Panels	To highlight the ongoing activities of the Tenant and Leaseholder Panels and provide an additional opportunity for tenant and leaseholder voices to be heard.	Information/Discussion Paper
	•	Review of the Housing Committee Forward Plan	To provide the Committee with opportunities to identify any additional areas they may wish to scrutinise.	Information/Discussion Paper
	•	Briefing Note - Housing Sector Insight	To provide the Committee with an overview of recent developments in the housing sector and provide opportunities for horizon scanning.	Briefing Note

# Briefing Note

**Committee name: Cabinet Housing Committee**

**Date: 21 January 2026**

**Responsible officer: Claire Hughes, Director of Governance, Housing and Communities, [claire.hughes@cheltenham.gov.uk](mailto:claire.hughes@cheltenham.gov.uk)**

This note provides information to keep Members informed of matters relating to the work of the Cabinet or a committee but where no decisions from Members are needed.

If Members have questions relating to matters shown, they are asked to contact the officer indicated.

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## Government Strategy and Announcements

- a. The Chancellor, Rachel Reeves MP, delivered the Autumn Budget on the 26 November 2025. Key announcements around housing included:
  - The government are still considering consultation responses on social rent convergence, with a decision expected in January 2026.
  - Local Housing Allowance (LHA) rates remain frozen.
  - The Warm Homes Fund received a £1.5bn boost in capital investment to tackle fuel poverty, in addition to the £13.2bn of funding allocated during the Spending Review in the summer. (See item e)
  - The government is not continuing the funding of the Energy Company Obligation on bills after March 2026 and is announcing £1.5 billion of new funding to support households facing fuel poverty.
  - The government will also fund 75% of the cost of the Renewables Obligation to households in 2026-27, 2027-28 and 2028-29.
  - The administration of housing benefit and pension credit will be brought together to streamline the process from autumn 2026.
  - The two-child benefit limit will be scrapped from April which it is estimated will take 450,000 children out of poverty.
  - To improve work incentives, from autumn 2026 the government is adjusting how earnings are treated for Housing Benefit and Universal Credit claimants in supported housing and temporary accommodation, so that most claimants will not be subject to reductions in income for working more hours.
  - Around a quarter of the £5bn National Housing Delivery Fund will be devolved across seven regions in the UK (Greater Manchester, Greater London, Liverpool City Region, the North East, South Yorkshire, West Midlands and West Yorkshire). The fund, announced in June and set to launch in spring 2026, aims to make complex housing regeneration and infrastructure projects viable. The

government say they remain committed to rolling out this funding model to more places at the next Spending Review.

- The government will soon consult on reforming VAT rules to encourage development on land earmarked for social housing.
- b. The implementation plans for the new Renters' Rights Act has been published and shows that reforms will be applied to the social rented sector in phase 2 from late 2026. The first phase of reforms, implementing the new tenancy regime in the private rented sector (PRS), will come into effect on 1 May 2026. These reforms include the end of no fault evictions and will give local authorities stronger enforcement powers, through changes to rent repayment orders and maximum penalties, the expansion of civil penalties, and a new requirement for local councils to report on enforcement activity. Further investigatory powers for local councils to inspect properties, demand documents, and access third-party data came into effect in December 2025.
- c. The next stage of the Department for Energy Security and Net Zero's (DSENZ) Warm Homes Plan, which seeks to retrofit hundreds of thousands of homes, will now be published in January 2026. Inside Housing has reported that up to £1.29 billion has already been earmarked for social landlords in England and £500 million for local authorities, but key decisions remain unresolved, including the future of the £7,500 Boiler Upgrade Scheme grant and how new schemes will be funded following the decision in the Budget to scrap the Energy Company Obligation (ECO) from March 2026.
- d. The government has announced its National Plan to End Homelessness, a cross departmental strategy backed by £3.5bn and designed to prevent homelessness, halve long term rough sleeping by 2029, and end the unlawful use of bed and breakfasts for families. To achieve these aims it will introduce legislation for a new duty to collaborate, requiring public bodies to work together to prevent homelessness and to avoid discharging anyone from prisons, hospitals, or social care services onto the streets. New targets will include halving the number of people who become homeless on their first night out of prison and ensuring that no eligible person is discharged from hospital to homelessness.

Funding commitments include:

- A new £124m supported housing scheme which will help more than 2,500 people off the streets and into stable accommodation.
  - A £15m innovation programme for councils.
  - A £37m communities programme supporting voluntary, community, and faith sector organisations.
  - A £950m investment from the Local Authority Housing Fund to build 5,000 good quality temporary homes to reduce pressure on temporary accommodation.
  - An additional £50m in year to local authorities through the Homelessness Prevention Grant.
- e. The government has published its Child Poverty Strategy, setting out a package of policies which aims to lift 550,000 children out of relative low income by 2030.

Commitments within the strategy focusing on housing and homelessness include:

- Ministers promise to end unlawful placements of families in B&B accommodation beyond the six-week legal limit, backed by £8 million of Emergency Accommodation Reduction Pilots in 20 areas with the highest use of B&Bs, continuing for three years.
  - The Government also confirms a fourth and largest round of the Local Authority Housing Fund worth £950 million from April 2026, intended to provide better forms of temporary accommodation by 2030.
  - A new legal duty on councils to notify schools, GPs and health visitors whenever a child is placed in temporary accommodation, with the aim of providing more co-ordinated support.
  - Commitments to working with the NHS to avoid mothers with newborns being discharged into B&Bs or similarly unsuitable housing.
- f. The Violence against Women and Girls strategy was published in December and included £500m for local authorities to provide support for victims of domestic abuse in safe accommodation, such as domestic abuse refuges, in confidential locations, far from the reach of perpetrators. For those who choose to remain in their own homes, local authorities can deliver Sanctuary Schemes offering practical measures that transform a victim's own home into safe spaces, with expert support to help victims and their children recover and move on with their lives. These schemes combine essential security upgrades such as lock changes, window locks and alarms with specialist domestic abuse support to help survivors stay safe, to give peace of mind and protection where they need it most. The £19 million uplift is expected to support an extra 4,900 households needing safety, meaning the total funding is expected to help nearly 140,000 people over the next three years.
- g. Homes England has published its strategic plan for 2025 to 2030, setting out how it will accelerate housebuilding, and support the market to deliver in excess of 300,000 new homes per year. The plan sets out how over the next five years Homes England will use its land, funding, expertise, and access to private capital to maximise delivery and provide grant funding. It will also offer new low-interest loans through the National Housing Bank, while strengthening relationships with registered providers, housing associations, local authorities, developers, and enhanced mayoral strategic authorities, to ensure they have "*the long-term funding certainty and flexibility they need to deliver their social and affordable housing ambitions.*" Homes England's director of affordable housing has also said recently that partners may be able to access funding above the £700m cap under the Social and Affordable Homes Programme, if the agency has "*certainty and confidence*" in deliverability.
- h. Following a recommendation from the Grenfell inquiry, the MHCLG has announced plans for a new regulator to bring together standards across buildings, products and professionals in the construction sector. The inquiry recommended that the government create a 'single construction regulator' to reduce fragmentation and complexity in the way the built environment is regulated. A consultation has been launched seeking views from the construction sector – responses and final plans are expected to be published in summer 2026.

### Regulator of Social Housing (RSH)

- i. The Regulator of Social Housing (RSH) has launched a consultation on changes to the Transparency, Influence and Accountability Consumer Standard, which aims to introduce new requirements around competency and clearer information for residents. It also proposes changes to the Consumer Standards Code of Practice, and Tenant Satisfaction Measures (TSMs). The consultation will run until 3 March 2026, with changes expected to come into force from April 2027. Proposed changes include:
  - The implementation of a new TSM covering electrical safety checks.
  - New requirements around staff competency, including mandatory qualifications for an estimated 30,000 senior housing managers and executives.
  - Tenants of private registered providers (PRPs) will have a similar level of access to information relating to the management of social housing as local authority tenants, with proactive publication and processes to formally request relevant information.
  - Tenants experiencing damp and mould will also be able to request information on how many other homes in their building have similar problems, and what action the landlord has taken regarding repairs.
- j. The government has concluded its Public Bodies Review of the Regulator of Social Housing (RSH), determining that a full-scale review of the regulator is currently not required. It has concluded that the RSH is a well-run organisation and identified no fundamental weaknesses in its governance, operations or delivery. Ministers stated that the regulator is operating effectively as the social housing sector adjusts to higher regulatory expectations, including stronger consumer regulation and a renewed focus on landlord accountability and standards. It has also set out areas of collaborative focus for the future – including how to share with residents an evidence base for the outcomes of social housing regulation and considering how performance is monitored and assessed across the sector.
- k. The RSH and the Charity Commission have published a Memorandum of Understanding setting out how they will work together to regulate organisations which are both private registered providers of social housing and registered charities. The Memorandum includes commitments to share information, raise issues at an early stage, signpost enquirers to the other organisation where appropriate, discuss matters of mutual interest such as stakeholder engagement, ensure consistency in communicating each other's roles, and avoid duplication while ensuring consistent treatment for bodies regulated by both organisations.

### Housing Ombudsman

- l. The Housing Ombudsman has published its latest 'Learning from Severe Maladministration Report' urging social landlords to "see the person behind the repair", drawing on a series of severe maladministration cases. Across cases identified, the Ombudsman found that landlords often worsened service failures by not considering vulnerability, leading to situations such as insecure doors for domestic abuse survivors, children exposed to electrical hazards or collapsing ceilings, and disabled residents left without essential facilities for months. Many

failures stemmed from missed or poorly managed appointments, inadequate record keeping, and outdated systems that wrongly recorded “no access”.

### Research and Campaigns

- m. The Office for National Statistics (ONS) has launched a consultation inviting the housing sector to help shape the questions and topics included in the 2031 census. The consultation, which will be open until 4 February 2026 aims to ensure housing and population statistics meet the needs of policy makers and local authorities.
- n. The District Councils' Network (DCN) has released a new analysis of how the government's freeze on temporary accommodation subsidy is draining councils across England of £268m a year. Whilst the government reimburses councils for providing temporary accommodation through housing benefit, the rate of subsidy has been frozen since 2011. Councils must pay landlords based on current market rates, creating a significant financial shortfall for local authorities. The Local Government Association (LGA) followed the DCN's analysis with its own report revealing that the amount spent by English councils on temporary accommodation is expected to rise to £3bn by the end of the decade.
- o. According to campaign group Stop Social Housing Stigma's (SSHS) national tenant survey, more than two thirds of tenants still feel stigmatised for living in social housing. The survey included responses from 1,460 social housing tenants and found:
  - 53% feel stigmatised because of the actions of their landlords.
  - Only 27% said that they trusted their landlord 'a lot' or 'a great deal'.
  - 69% thought the government had done little or nothing to address stigma.
  - Only 5% believed the RSH had 'done a lot' and just under 39% felt it had 'not done very much' or 'done a little'.
  - 7.4% of respondents thought the Housing Ombudsman had 'done a lot' while 36.5% felt it had 'done not very much' or 'done nothing'.

## **Summary of upcoming regulatory changes on performance reporting**

There have been several regulatory changes that have been reported to Housing Committee via sectoral insights, the following is a summary of key changes and how they are going to be integrated with the ongoing performance reporting project. An explanation as to why there will be some circumstantial reporting as some of the regulatory changes are enforced on a phased basis has also been included.

### **1. Changes to electrical safety standards**

The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2025, have now been extended to include the social rented sector; The Electrical Safety Standards in the Private Rented Sector (England) (Amendment) (Extension to the Social Rented Sector) Regulations 2025.

This sees a significant shift in statutory responsibilities for registered social landlords (RSLs). This amendment now aligns safety standards across private and social rented properties resulting in consistency in tenant protection.

The changes impacting social landlords are:

- Electrical safety inspections are carried out at least every 5 years (by a qualified person)
- Tenants must receive an Electrical Installation Condition Report (EICR) within 28 days of the inspection
- New tenants must be issued an Electrical Installation Condition Report (EICR) before moving in
- All tenants must be provided with the EICR for their property; valid EICRs must be issued, new inspections not necessary if there is a valid/in- time report held
- In service inspection and testing (ISIT/PAT testing) on all electrical equipment/appliances included the tenancy
- Complete a PAT testing remedials within 28 days
- Prospective tenants can request EICR reports and RSLs must provide these within 28 days.

It is important to state the obligation to provide an EICR is only related to individual properties. There is no statutory responsibility to provide EICRs for communal areas of blocks.

Also worth noting, electrical inspection and PAT testing can be undertaken at the same time.

Some other specific expectations include:

- EICR report must also state whether electrical equipment checks are up to date
- EICR report (a copy will suffice) must be kept until the next inspection and test is required or (if later than this) conducted, unless it is superseded by a more recent report.
- Supply a copy of the EICR report to the inspector and tester who will undertake the next inspection and test.



- Within 28 days of the completion of the remedial work or further investigative works, supply the tenant with the report, and written confirmation from the qualified person who carried out the works.

### ***Implementation dates***

There are two phases of enforcement:

- Phase 1 – From 1 November 2025 they apply to all new tenancies granted on or after that date
  - For existing tenancies, if a valid EICR is held but has not yet been provided to the tenant, this must be supplied to the tenant by 30 April 2026 (new inspection not necessary)
- Phase 2 – From 1 May 2026 they apply to all existing tenancies that were granted before 1 December 2025
  - Phase 2 must be completed by 1 November 2026; all pre-existing tenancies must have been inspected under the new regulations by this date.

### ***Compliance/Performance measurements and reporting***

Given this is a compliance change 100% compliance is expected and all performance metrics will use 100% compliance as the performance measurement.

It will be critical that for the duration of the implementation i.e. the two phases of enforcement, that temporary performance reporting is developed so manage existing reporting and the transitional measurements. When the transition between phases is completed, permanent reporting will be agreed and presented to Housing Committee. So to manage the expectations of Housing Committee, it is likely there are small changes in each report that comes to Committee over the next year however where necessary, changes will be supported by narrative in the report.

## **2. Changes to hazards safety standards**

Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025 also known as Awaab's Law, came into force on 27 October 2025. Awaab's Law is a subsidiary legislation created under the powers granted by The Social Housing (Regulation) Act 2023 (in section 42), which realises the Act's aims to improve social housing standards. Also noteworthy when the Social Housing (Regulation) Act became law, a new section 10A was added to the Landlord and Tenant Act 1985; this foundation clause allowed new rules on hazards in social housing, such as Awaab's Law, to be introduced.

Many people automatically associate Awaab's Law with damp, mould and condensation (DMC); they rightly associate the Law with the death of Awaab Ishak given Awaab died *after being exposed to mould* at his Rochdale home in December 2020. It is however important to state that Awaab's Law encompasses a wider range of hazards beyond DMC. Awaab's Law is orientated around ensuring safer housing conditions for tenants by holding landlords to account. Awaab's Law seeks to protect tenants from dangerous health and safety hazards including damp and mould, asbestos and domestic and personal hygiene hazards. The Law gives tenants the **right to demand repairs to ensure their homes are safe and provides** a legal obligation on landlords to investigate and repair health hazards within strict time limits.

### ***Hazards in scope of Awaab's Law***

For a hazard to be in the scope of the repair requirements under Awaab's law, it must:

- be a part of buildings or land for which the social landlord is responsible
- be the landlord's responsibility to fix
- result from defects, disrepair or lack of maintenance
- be a significant or emergency hazard
- not be damage that is a result of the breach of contract by the tenant.

It is important to define the emergency and significant hazards so to understand when the Law will apply. Using governmental definitions, they are described as:

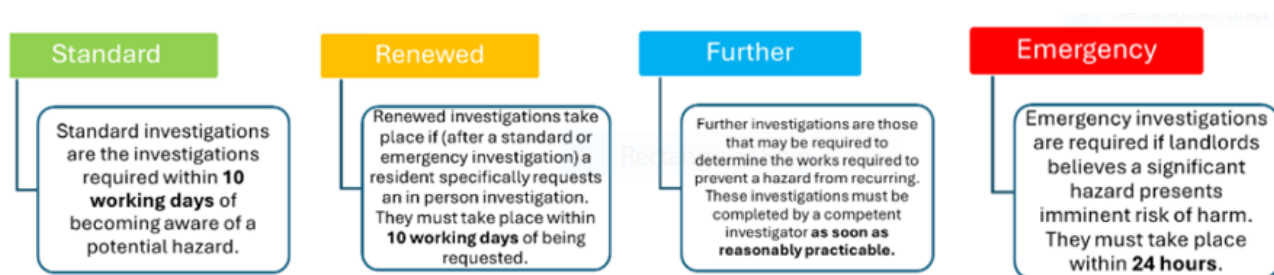
Emergency hazard	An emergency hazard is defined as one that poses <i>an imminent and significant risk of harm</i> to the health or safety of the tenant. An 'imminent and significant risk of harm' is defined as <i>a risk of harm to the occupier's health or safety that a reasonable social landlord with the relevant knowledge would take steps to make safe within 24 hours.</i>
Significant hazard	A significant hazard is defined as a <i>significant risk of harm</i> to the health or safety of a tenant. A <i>significant risk of harm</i> is defined as <i>a risk of harm to the occupier's health or safety that a reasonable lessor with the relevant knowledge would take steps to make safe as a matter of urgency.</i>

Compliance with Awaab's Law will only be achievable and measurable through robust systems for identifying, responding to, and remediating hazards which are driven by the defined statutory timeframes and evidenced by proactive and thorough inspections, clear record-keeping, and prompt communication.

The investigatory process of hazards is a critical aspect of Awaab's Law. Under Awaab's Law there are 4 key types of investigations:

1. Standard investigations
2. Renewed investigations
3. Further investigations
4. Emergency investigations

Each type of investigation has strict timeframes associated with them:



Upon investigation, should a landlord find there is no significant or emergency hazard there are no further repair requirements under Awaab's Law.

### ***Implementation dates***

There are three phases of enforcement:

#### **Phase 1 – Mould, damp and emergency hazards (From October 2025)**

Phase 1 sees the introduction of time limits and other statutory requirements on social landlords in respect of DMC and 'emergency hazards'.

The requirements of Phase 1 are as follows:

- If a social landlord becomes aware of a potential damp and mould hazard in a social home, they must investigate within 10 working days to ascertain if there is a hazard.
- The landlord must provide residents with a written summary of the investigation findings within three working days of the investigation concluding.
- If it is found that the damp and mould hazard poses a significant risk of harm to the health or safety of a resident, the social landlord must make the property safe (using temporary measures if necessary) within five working days of the investigation. Supplementary work needed to prevent serious hazards reoccurring must be completed within 12 weeks and overall repair works must be completed within a reasonable time period.
- In an emergency situation, the social landlord must investigate and action any emergency repairs as soon as reasonably practicable and, in any event, within 24 hours.
- If the property cannot be made safe within the specified timescales for Awaab's Law, then the social landlord must offer to arrange for the residents to stay in suitable alternative accommodation, at the social landlord's expense, until it is safe to return.
- Landlords must keep clear records of attempts to comply with these requirements, including records of all correspondence with the resident(s) and any contractors. If the landlord is unable to meet these requirements for reasons beyond their control, they will be expected to provide a record of the reasons that prevented them from doing so.

## **Phase 2 – Expansion of hazards (from 2026)**

Statutory time limits will be introduced for additional types of ‘significant hazard’. This will include:

- excess cold and excess heat
  - falls associated with baths etc., on level surfaces, on stairs and between levels
  - structural collapse, and explosions
  - fire, and electrical hazards
  - domestic and personal hygiene and food safety

## **Phase 3 – All remaining hazards (By 2027)**

Awaab's Law will be extended to include all remaining hazards, in the Housing Health & Safety Rating System (except overcrowding), where they present a significant risk of harm. This includes (amongst others) protection against accidents and protection from: asbestos and manufactured mineral fibres, biocides, carbon monoxide and fuel combustion products.

While Phase 2 and 3 are designed in the Law implementation roadmap, currently only high-level narrative is available on these phases so the requirements of these phases are yet to be formally documented. This is however clearly caveated by an official UKG statement that the phased approach does not mean that social landlords have leeway on addressing dangerous issues in their homes in the transition period to the commencement of the phase enforcement date. Social landlords must continue to meet the Safety and Quality standard outcomes as defined by the Regulator of Social Housing. This means social landlords must continue to meet the existing legal duties to keep homes safe (by fixing disrepair), and keeping homes fit for human habitation and free of dangerous Category 1 health or safety hazards.

### ***Compliance/Performance measurements and reporting***

There is a necessity to have imminent focus on the compliance of phase 1 due to the 27 October 2025 enforcement date but also because the formal guidance on the other phases is not yet available in terms of specifics.

Given this is a compliance change 100% compliance is expected and all performance metrics will use 100% compliance as the performance measurement. What will be key in the phase 1 reporting is that our reporting represents our performance in relation to DMC and ‘emergency hazards’ both in scope and out of scope of Awaab’s Law and the Regulator will expect to see this given the official statement made when social landlords responsibilities to meet Safety and Quality standard outcomes.

As part of the ongoing audit, we have identified some DMC data for our current DMC management however this is not yet in a format that allows for sound reporting. Work is currently being prioritised that will allow us to management DMC performance against the new regulatory framework and to report on DMC activity as part of the monthly compliance reporting. As of yet, timeframes cannot be put on this work however assurance is given that DMC compliance and reporting is being treated as an utmost priority with the workplan for both the Head of Regulatory Compliance and the Interim Head of Governance, Risk and Assurance.

It will be critical that for the duration of the implementation i.e. the three phases of enforcement, that temporary performance reporting is developed so manage existing reporting and the transitional measurements. When the transition between phases is completed permanent reporting will be agreed and presented to Housing Committee. So to manage the expectations of Housing Committee, it is likely there are small changes in each report that comes to Committee over the next year however where necessary, changes will be supported by narrative in the report.

### **3. Current consultation on electrical safety checks TSM**

It is noteworthy that the Regulatory has opened a consultation on changes to electrical standards. The consultation is currently open and closes on 31 March 2026. The consultation is on proposed changes to the TI&A Standard and the Code, and the proposed introduction of an electrical safety checks TSM.

While this it is only consultation stage it must be recognised there is usually strong motivation to either get to the position that is being consulted on or getting close to it. Therefore, we will keep engaged with the consultation process and ensure improvements and/or changes we make to our systems, ways of working and reporting are futureproofed so we can respond quickly and efficiently to anything that comes out of this consultation.

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