

Cheltenham Borough Council

Cabinet – 15 July 2025

Compliance Strategy and Policies

Accountable member:

Councillor Flo Clucas, Cabinet Member for Housing and Customer Services

Accountable officer:

Claire Hughes, Director of Governance, Housing and Communities

Executive summary:

This report brings forward a new compliance strategy and revised compliance policies for the big six areas of compliance in housing (gas, electrical, fire, asbestos, water and lifts). The committee are asked to recommend that the Cabinet approve the strategy and policies.

The compliance strategy action plan will be monitored via the Compliance Monitoring Group and captured within our Housing Improvement Programme.

Recommendations: That Cabinet:

- 1. adopts the Compliance Strategy (Appendix 2);**
 - 2. adopts the following Compliance Policies:**
 - i. Gas and Heating Safety (Appendix 3)**
 - ii. Electrical Safety (Appendix 4)**
 - iii. Fire Safety (Appendix 5)**
 - iv. Asbestos (Appendix 6)**
 - v. Water Safety (Appendix 7)**
 - vi. Lift Safety (Appendix 8)**
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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. In 2023, we made the strategic decision to bring CBC owned properties and housing services back under our own management and that transfer took place on 1 July 2024. These properties are subject to landlord property compliance arrangements to ensure they are safe places to live and work.
- 1.2 A key driver in this change was to ensure that our tenants were at the heart of everything we do and that their safety, together with the standards of their homes is our number one priority.
- 1.3 Ahead of the transfer, in June 2024 Cabinet approved a range of compliance policies relating to the big 6 areas of compliance, namely gas, electrical, fire, asbestos, water and lifts.
- 1.4 Since the transfer we have been on an improvement journey, developing our services and our approach to compliance. On 1 April officers attended a facilitated session with Pennington Choices Limited where our compliance strategy was created and developed.
- 1.5 Building on the Compliance Strategy officers attended a further facilitated session with Pennington Choices on 30 April to review our existing compliance policies. A further session on 5 June will develop this work further creating a suite of operational procedures and process maps, ensuring everyone is clear on our approach to compliance.

2 Compliance Strategy

- 2.1 The development of a compliance strategy enables the council to be clear, both internally and externally about its approach to compliance. Modelled around the 'three lines of defence' risk management and assurance framework it provides clarity and structure around all components that need to work together to ensure successful property compliance delivery.
- 2.2 The strategy outlines our arrangements across the 'big six' areas of compliance as well as damp and mould. It concludes with our overall objectives, and a supporting action plan, which demonstrates our commitment to prioritising tenant safety and continuous improvement.
- 2.3 Delivery of the action plan will be monitored by the Compliance Monitoring Group and captured within our Housing Improvement Programme.

3 Compliance Policies

3.1 The council adopted a suite of compliance policies in June 2024 as part of the transfer of Housing Services. At that time, it committed to carrying out a full review of those policies post transfer.

3.2 Supported by Pennington Choices Limited that review has now concluded and attached are a revised suite of policies which the committee are asked to review and recommend to cabinet for adoption.

3.3 In accordance with our new compliance strategy each policy has been updated to ensure that it contains the following information:

- Ownership, review and approval
- Introduction, objectives and scope
- Roles and responsibilities
- Legislation, guidance and regulatory standards
- Obligations
- Statement of intent
- Programmes
- Follow up work
- Data and records
- Resident engagement
- Competent persons
- Training
- Performance reporting
- Quality assurance
- Significant non-compliance and escalation

3.4 Whilst most elements of the policy are statutory there are some areas where strategic choices were required, for example our desire via our planned maintenance programme to upgrade all smoke detectors to LD1s, the highest level of fire protection for a domestic property.

3.5 Adopting these policies demonstrates the councils commitment to safety and ensures that compliance remains our priority.

4 Key risks

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

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Appendices:

- i. Risk Assessment
- ii. Compliance Strategy
- iii. Gas and Heating Safety
- iv. Electrical Safety
- v. Fire Safety
- vi. Asbestos
- vii. Water Safety
- viii. Lift Safety

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 and compliance failures, 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	July 2025
2	If the Council does not have clear property compliance policies in place or does not comply with the provisions of the policies then there is a significant safety and reputational risk to the Council.	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	July 2025
3	If the Council does not have clear property compliance policies in place or does not comply with the provisions of the policies then there is a significant financial risk to the Council.	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	July 2025
4	If the Council does not have clear property compliance policies in place or does not comply with the provisions of the policies then there is a significant legal risk to the Council.	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	July 2025