



Cheltenham Borough Council

Property Compliance Strategy

2025 - 2028

Owner	Director of Governance, Housing and Communities
Directorate	Governance, Housing and Communities
Last review	June 2025
Next review	June 2028
Consultation	Tenant Panel, Cabinet Housing Committee
Approved by	Cabinet
Version	V1.0
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1. Introduction

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 2024, we made the strategic decision to bring CBC owned properties and housing services back under our own management. These properties are subject to landlord property compliance arrangements to ensure they are safe places to live and work.

Property compliance and building safety is ultimately about risk management and keeping people safe. We strive to achieve this by meeting our legal and regulatory obligations through well-managed testing, servicing, and inspection programmes and carrying out remedial and follow-up actions when required.

Success relies on robust data management, performance management, assurance reporting, and employing competent individuals and suppliers. We use the 'three lines of defence' assurance framework to ensure that each of these elements work effectively together (see Section 2).

With recent changes in the legal and regulatory landscape and due bringing housing services back to CBC we have refreshed our **Corporate Plan** and also created a **Mission Statement** for CBC's housing services. Together with our **Asset Management Strategy and Tenant Engagement Plan**, these set out our objectives for the housing service. This strategy supports our vision and forms part of our wider organisational commitment to driving a positive health and safety culture among our employees, contractors and stakeholders as detailed within our **Health**

and Safety Policy. We also continue to learn from the ongoing impact of the Grenfell Tower fire tragedy in 2017, which was a catalyst for change within the social housing sector. We want to ensure that as far possible, no similar event occurs within our housing portfolio.

Together with our tenants we provide safe, secure and well-maintained homes that help everyone to reach their potential.

Since bringing housing services back to CBC, we have been on an improvement journey to develop a greater understanding of our buildings, our compliance arrangements and our response to the new regulatory challenges. This has resulted in a **housing improvement programme** which will strengthen our approach.

To support the improvement programme, on 1 April 2025, CBC employees attended a facilitated workshop with external consultant Pennington Choices Ltd. to develop a property compliance strategy (this strategy) to document our overarching framework, objectives, and priorities for property compliance delivery.

The following sections of this strategy outline these arrangements across the 'big six' areas of property compliance: gas, electric, fire, asbestos, water, and lifts, as well as damp and mould. The strategy concludes with our overall objectives, and supporting action plan, to demonstrate our commitment prioritising resident safety and continuous improvement within CBC.

2. Three lines of defence

This strategy is modelled around the ‘three lines of defence’ risk management and assurance framework. We have adopted this framework to provide clarity and structure around all of the components that need to work together to ensure successful property compliance delivery. We can check and measure our performance against each line of defence to ensure a holistic approach to provide assurance.

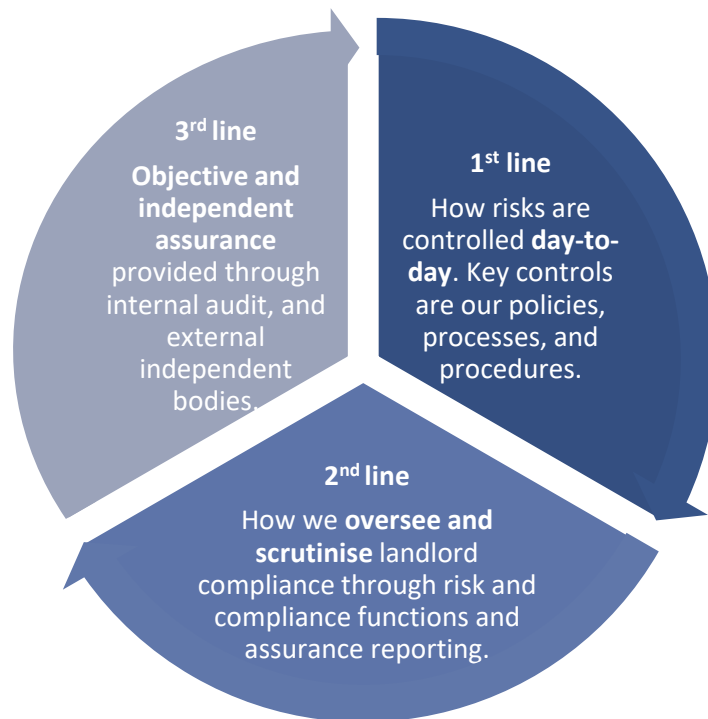


Diagram 1: Three lines of defence model.

Sections 7 - 15 of this strategy describe how we put the three lines of defence framework into effect (also illustrated in Diagram 2 below).

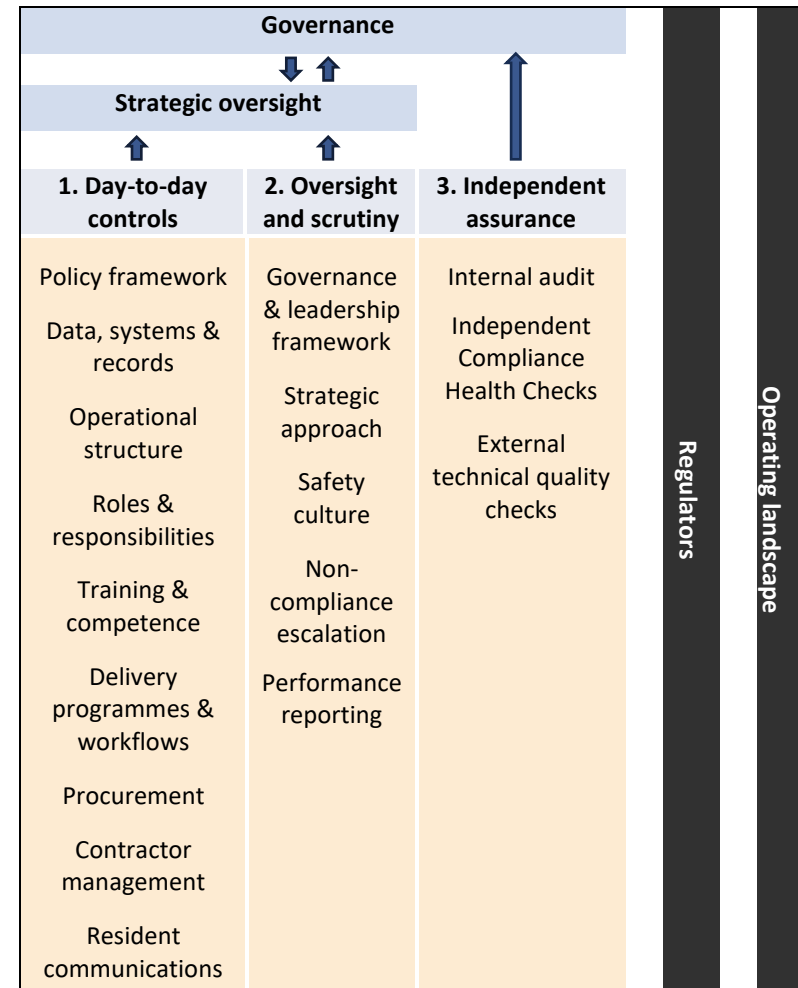


Diagram 2: Three lines of defence in practice.

3. Context: Properties & residents

The scope of this strategy includes CBC assets which are assigned to the housing revenue account. These are primarily domestic properties, communal blocks, and schemes. This strategy does not cover commercial or public buildings.

Shared ownership properties as well as a small number of private rentals are included within compliance performance data to ensure we retain full oversight. We adopt a zero-tolerance approach to risk within these arrangements.

Properties		
Item	Count	Description
Domestic	4710	Flats, houses, bungalows, and so on.
Managed domestic	0	Domestic properties we own that are managed by a third party.
Communal blocks	447	Total number of all communal blocks.
Shared Ownership	51	
18m+ blocks	0	N/A
11m+ blocks	5	5 (with x 3 having EWS)
Private Rental	13	Monitored but reported aside from HRA assets
Schemes	17	Independent living, sheltered, and so on.

Table 1: Our properties by type.

CBC operates a diverse range of tenures, as illustrated in the table and pie chart below. CBC have been working to ensure that we meet the housing needs of all our customers. Our aim is to ensure our priorities and activities going forward reflect our additional responsibilities not only as a housing provider, but as landlord to the tenants and leaseholders who live in our properties.

Units		
Type	Description	Count
Social housing	Social Rent and Affordable Rent	4,640
Leaseholders	Leasehold properties	426
Other tenures	Private Rental and Shared Ownership	64

Table 2: Our residents/units by type.

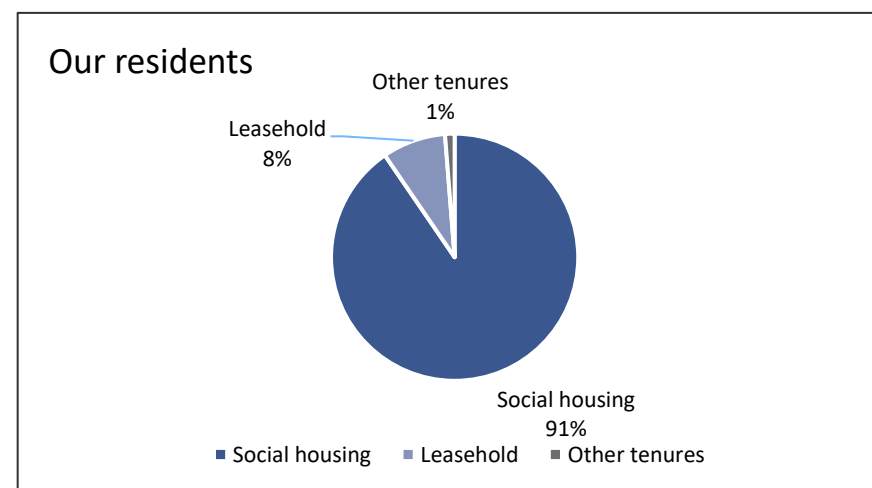


Diagram 3: Resident breakdown.

4. Context: Operating landscape

CBC must meet a range of legal and regulatory duties in respect of the safety and quality of our homes. The legal landscape around safety and compliance has changed considerably over the past five years, with the introduction of new pieces of legislation, including the Fire Safety (England) Regulations 2022, Building Safety Act 2022, and Social Housing (Regulation) Act 2023. Awaab's Law will also be implemented from October 2025.

We must ensure we stay up to date with obligations to ensure we meet our duties. Failure to comply could mean legal action from the Health and Safety Executive or our residents. The Regulator of Social Housing can also impose sanctions if we fail to meet regulatory standards. We must also provide services to residents in a way which meets the expectations of the Housing Ombudsman. Whilst we do not have buildings over 18m in height and in scope of the Building Safety Regulator, we must also monitor changes in this area as the threshold for intervention is likely to be lowered.

Diagram 4 demonstrates how we stay up to date with changes that have an impact on property compliance and building safety.

We are risk aware, not risk averse. Our **Risk Register** demonstrates that we understand, and have considered, wider risks in the operating environment. The housing and compliance risks are reviewed every six months by the Director of Governance, Housing and Communities and Cabinet Housing Committee.

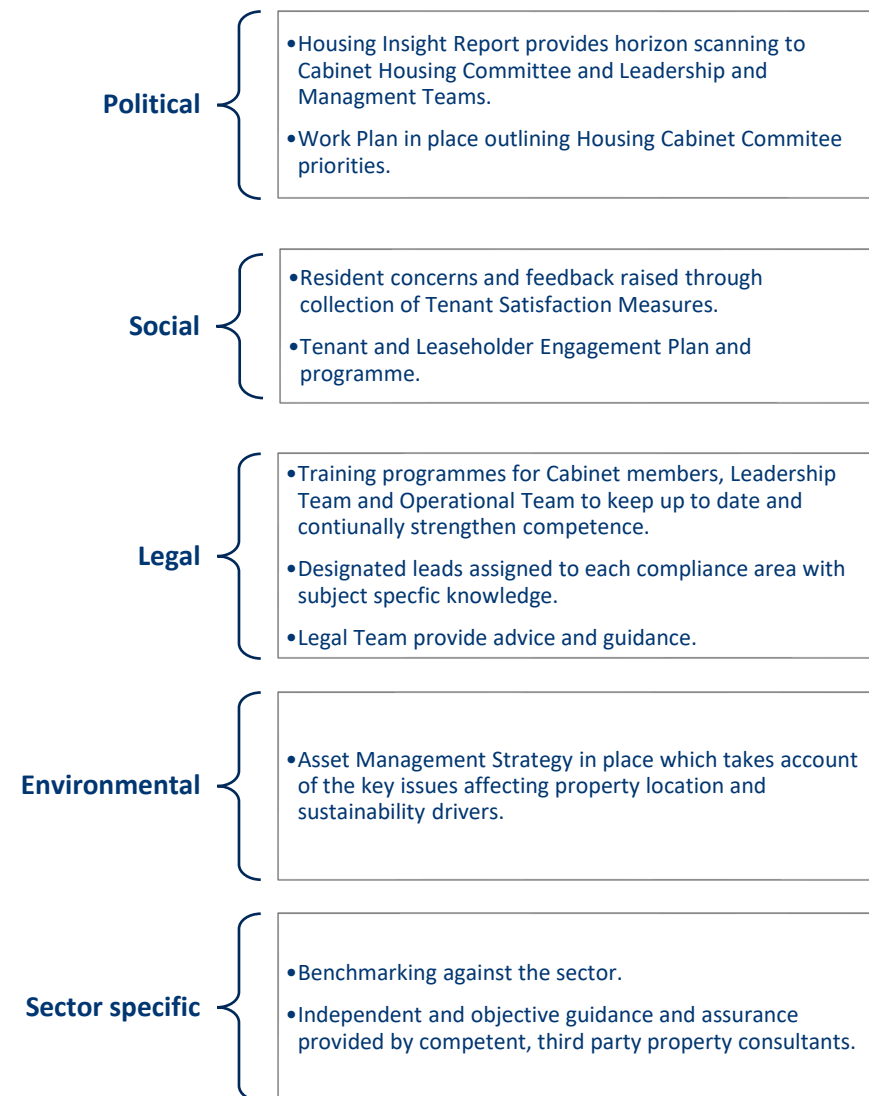


Diagram 4: Operating landscape.

5. Context: Regulator of Social Housing

The Social Housing (Regulation) Act 2023 received Royal Assent in July 2023. It aims to improve social housing quality by delivering ‘transformational change’ for social housing tenants. The Act has enabled the Regulator of Social Housing (RSH) to implement a new, proactive consumer regulation regime through a new set of strengthened consumer standards that CBC must comply with.

The new Safety and Quality Standard, which has been in effect since April 2024, requires landlords to provide safe and good-quality homes for their tenants, along with good-quality landlord services.

The RSH will include us in their programme of planned inspections to review how we are performing against the new standards. We must be prepared to provide them with evidence and assurance that we have an effective framework for managing property compliance in place.

If the RSH believes that we do not, and improvements are required, they can use a range of tools for intervention, until they are satisfied issues have been addressed and measures and controls are in place to prevent a recurrence. To support this, we engage proactively with RSH as part of the co-regulatory approach required under the consumer standards.

The RSH will also gather information in between planned inspections, through the tenant satisfaction measures, quarterly survey or other engagement. As a result, we must always ensure compliance with the standards. This strategy demonstrates how we will meet the health and safety requirements under the Safety and Quality Standard.

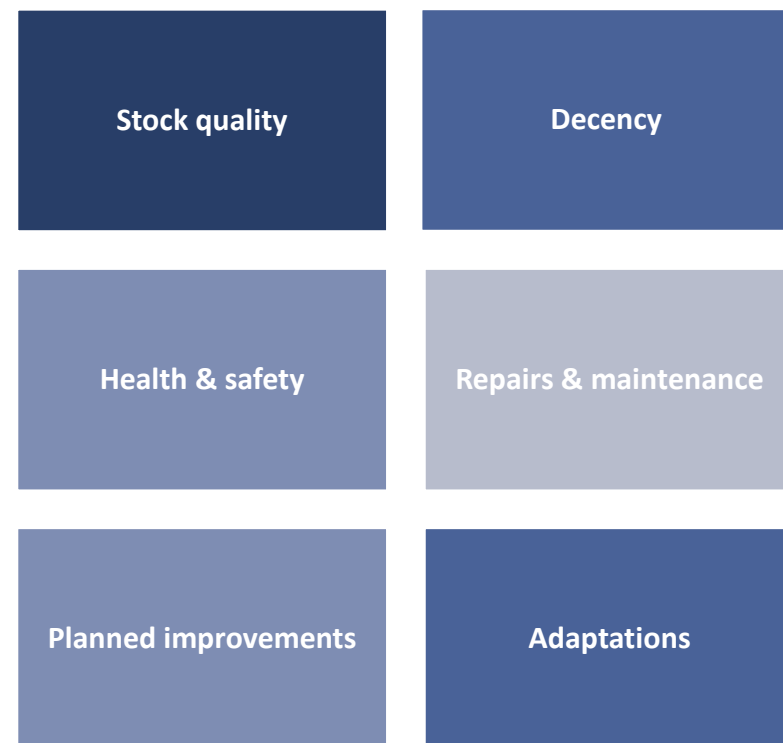


Diagram 5: The six elements of the Safety and Quality Standard.

6. 1st line: Policy framework

Having a robust compliance policy framework in place to support this strategy is key to ensuring CBC meets its legal obligations and our stakeholders understand what we will do to achieve compliance.

We are updating our compliance policies across the compliance areas to set out **what** we will do to meet our legal and regulatory obligations and show that we have considered relevant strategic choices that have significant cost and risk implications. Each policy will be updated to include all the items listed in Diagram 6.

The policies are approved through our governance framework and ultimately by the Cabinet. They will be reviewed at least every two years, or sooner if legislative requirements change.

The policies will be supported by operational process maps and procedure documents which are also being developed. These will outline **how** we deliver end-to-end compliance processes and include milestones, timescales, interdependencies, roles and responsibilities, contract delivery and confirm how operational performance and compliance will be monitored.

Our policies will include the following:

- ✓ 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

Diagram 6: Policy content.

7. 1st line: Data and systems

Successful data management supports our assurance and delivery of property compliance. We must understand how many properties we own and manage and which compliance programmes they should be included on.

QL is our parent housing management system with our compliance programme data and records held between QL, Data Hub, Documotive and Excel. The table below provides an overview of where compliance data is held.

Area	Programme	Follow-up actions	Records
Gas	Excel >QL	Excel >QL	Documotive > Contractor Portal
Electric	Excel >QL	Excel > QL	Documotive
Fire	QL	QL	Documotive
Asbestos	Excel >QL	Excel >QL	Documotive > Contractor Portal
Water	Excel >QL	Excel > QL	Documotive > Contractor Portal
Lifts (communal)	Excel > QL	Excel > QL	Documotive
Damp and Mould	QL	QL	Documotive

Over the next 12 months we will be making a number of data and system improvements to ensure we manage and deliver compliance programmes effectively. This will ensure we understand our properties better so that we have one universally agreed version of the truth.

Our **top three** compliance data priorities are to:

1. Transition from the use of manual systems and Excel to ensure compliance programmes, follow-up actions and records are recorded and managed consistently on the QL system.
2. Undertake a data validation exercise to support migration to QL and ensure all required properties are included on compliance programmes with valid and evidenced based reasons for any exclusions.
3. Explore the reporting functionality of QL to automate our performance reporting to give greater data assurance.

Following data validation, we will implement monthly data reconciliation across all assets, compliance programmes and systems to ensure that records remain accurate and up to date. This will include sample checks of compliance records to ensure inspection dates are being captured correctly within each system.

Table 3: Compliance data locations.
Key: > System to be implemented.

8. 1st line: Operational structure

The Property Compliance Manager(s) have overall operational responsibility for property compliance. They are supported by officers with responsibility for individual compliance areas. Beneath these managers are contract managers, officers, coordinators, risk assessors, engineers, and technical assistants to make up the full operational structure

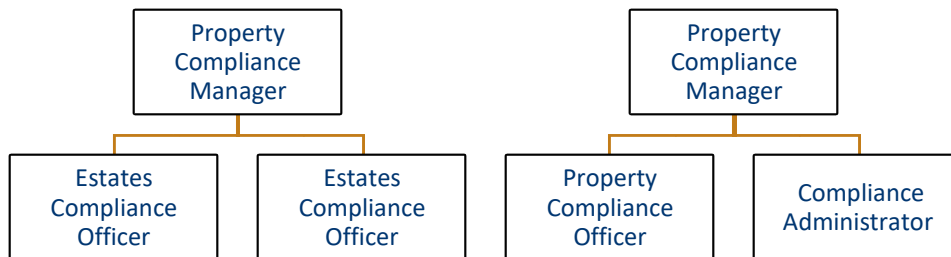


Diagram 5: High level operational structure for compliance delivery at CBC.

Training and competence

We will update our policies to detail the qualifications, skills, and competencies we require individuals to hold for each area of compliance. We will also encourage and support CBC staff to gain relevant compliance management qualifications.

We will only engage competent, qualified, technical consultants and contractors to provide external assurance, technical advice, and to deliver compliance inspections and remedial works.

Health and Safety Lead

As required under the Social Housing (Regulation) Act 2023 we have appointed The Deputy Chief Executive as our Health and Safety Lead to:

1. Monitor our compliance with health and safety requirements.
2. Assess risks of failure to comply with health and safety requirements.
3. Notify CBC councillors of the risks assessed and any material failures to comply with health and safety requirements.
4. Provide advice to councillors as to how CBC should address associated risks and failures.

9. 1st line: Procurement and contract management

All our compliance contracts will be formally procured, with support from third-party technical experts and our shared services procurement team, to ensure service specifications are robust. We will be implementing annual contractor checks to review insurance, qualifications, and accreditations to ensure standards are maintained for the duration of each contract.

We will proactively manage all contractors through a framework of structured formal contractor meetings and arrangements across all compliance programmes. We will provide regular contract management training for individuals managing and dealing with compliance and building safety contracts.

Area	Inspection frequency
Gas (Landlord's gas safety records)	Annual
Electric (Electrical installation condition reports)	5 years
Fire (Fire risk assessments)	High risk blocks 3 years Low risk blocks 4 years
Asbestos (Re-inspections)	Annual for Garages 1 / 2 / 3 / 4 & 5 years based on the risks and survey results stating timeframe
Water (Legionella risk assessments)	2 years
Lifts (Thorough examinations)	6 months

Table 4: Compliance programme frequencies.

10. 1st line: Customer communications

We are improving our approach to communicating with our residents and will implement our Customer Engagement Strategy for the housing service to put the voice of customers at the heart of everything we do. This includes working with customers to keep their homes safe and making sure customers have a range of methods they can get involved in shaping our services.

Our Tenant Voice newsletter provides our residents with the latest updates about their homes and the local community. It includes different ways that residents can engage with us to share their thoughts and concerns.

We provide information through our Tenant and Leaseholders Handbooks and on our website on keeping homes safe. We are working with customers to update and improve these.

We will also develop a resident safety communications plan to strengthen our approach to resident health and safety. We will proactively promote the work we do to keep our residents safe and develop an annual plan that raises general awareness about key safety issues as residents are often best placed to mitigate risks themselves.

11. 2nd line: Governance and strategic oversight

Our governance structure, as illustrated in the image below, demonstrates how we implement effective scrutiny and oversight of property compliance.

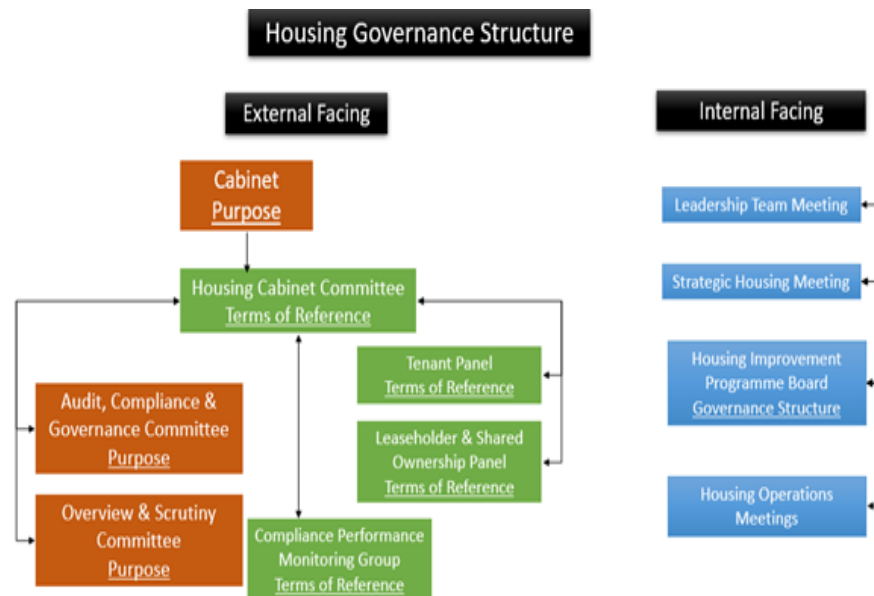


Diagram 6: : CBC Governance Structure.

Our Leadership Team, Compliance Monitoring Group, Cabinet Housing Committee and Cabinet Member for Housing and Customer Services all receive regular landlord property compliance performance reporting.

Our Cabinet has overall governance accountability to ensure full compliance with legislation and regulatory standards, and the Director of Governance, Housing and Communities has overall strategic accountability for property compliance and the health and safety of our homes.

To ensure tenants and leaseholders have oversight of property compliance, we have established tenant and leaseholder panels which feed into our Cabinet Housing Committee. Tenant and leaseholder representatives also sit on the Cabinet Housing Committee.

We provide awareness training on property health and safety compliance to our elected members, Leadership Team and residents to inform strategic decision making, including how to provide effective challenge, scrutiny, and oversight.

12. 2nd line: Safety culture

We are committed to developing and maintaining a strong safety culture within CBC based on the following principles:

Effective leadership

- Appropriate proportion of time, money and resources are allocated to deliver compliance arrangements.
- We prioritise risk and quality over cost and profit.

Positive organisational environment

- Managers need to be seen visibly leading by example through talking about landlord health and safety compliance and following correct procedures.
- Acknowledging that people make mistakes without blame reporting. Instead, our focus is on continuous improvement while holding people accountable for their actions.
- Roles and responsibilities are clearly defined and allocated so everybody knows what they are expected to do in different health and safety scenarios.
- Critical issues are not overlooked and dealt with as they emerge.

Effective communication

- Top down and bottom-up open communication.
- Health and safety is acknowledged to be everyone's responsibility and be part of everyday work conversations.

13. 2nd line: Reporting & escalation

Reporting

As a minimum we will report the following performance indicators for each area of property compliance:

- ✓ Total number of properties domestic/ communal (number).
- ✓ Properties not on programme (number).
- ✓ Properties with valid and in date inspection records (number and percentage).
- ✓ Properties without valid and in date inspection records (number and percentage).
- ✓ Properties due within the next 30 days (number).
- ✓ Follow-up works by priority and overdue status (number).
- ✓ Explanation of corrective action required and progress with completion of follow-up works (narrative).

Performance is reported monthly to Compliance Group and Leadership Team, and quarterly to Cabinet Housing Committee

Non-compliance escalation

Any incident which could result in a breach of legislation or regulatory standard, or which causes a risk to health or safety, and needs to be managed as an exception will be escalated from operational level through our governance framework. Escalation routes will be outlined within our compliance policies.

14. 3rd line: Quality assurance

Our third line of defence is about ensuring we have independent and objective assurance around compliance delivery. To support this, we will consider implementing programmes of third-party technical audits across all compliance areas. This will provide quality assurance through fieldwork checks and desktop reviews of compliance records on a sample basis. Our approach to each compliance area will be set out within individual policies.

We will also review our internal audit function with the aim of developing a programme that includes all six compliance areas, and damp and mould, at least once every two-years. We will ensure that the internal auditors are competent to undertake this task.

We will also consider commissioning an independent, external 'health check' of property compliance periodically (every three years). The purpose will be to test compliance with legal and regulatory requirements and to identify any non-compliance issues for correction collectively across all areas.

15. Supporting documents

- Mission Statement for Cheltenham BC Housing Service
- Corporate Plan
- Asset Management Strategy
- Risk Register
- Customer Engagement Strategy
- Individual compliance policies x 6
- Damp and Mould Policy
- Health and Safety Policy
- Housing Improvement Plan

16. Objectives

The four key objectives below summarise our priorities for delivering this strategy to keep our properties compliant and support resident safety. The action plan at Appendix 1 includes the key activities we need to deliver to meet these objectives over the next three years. This strategy, objectives and action plan will be reviewed periodically to ensure they remain an accurate reflection of what we would like to achieve. The objectives will also be reviewed if there is a change to any applicable health and safety legislation.

OBJECTIVE 1	Key results
STRENGTHEN 1ST LINE OF DEFENCE WITHIN PROPERTY COMPLIANCE FRAMEWORK	<p>We will strengthen our first line of defence to ensure all day-to-day operational controls are implemented.</p> <p>We will also improve the accuracy of our data and the use the QL compliance system to manage all compliance programmes.</p> <p>This will be completed by April 2026</p>

OBJECTIVE 2	Key results
STRENGTHEN 2ND LINE OF DEFENCE WITHIN PROPERTY COMPLIANCE FRAMEWORK	<p>We will update compliance reporting templates and scorecards to provide the appropriate amount of detail and clarify non-compliance escalation processes by September 2025.</p> <p>This will help our Leadership and Governance Teams to challenge and scrutinise compliance performance effectively, and ensure non-compliance is escalated within appropriate timeframes.</p>

OBJECTIVE 3	Key results
STRENGTHEN 3RD LINE OF DEFENCE WITHIN PROPERTY COMPLIANCE FRAMEWORK	<p>We will establish and implement quality checking regimes to provide independent and objective assurance around our property compliance management and delivery framework. This will be completed by April 2027</p> <p>This will also provide assurance that the improvement actions we have taken have been embedded within the organisation successfully.</p>

OBJECTIVE 4	Key results
STRENGTHEN OUR PEOPLE AND ENGAGEMENT TO SUPPORT OUR COMPLIANCE FRAMEWORK	<p>We will review our existing staffing structures to ensure we are appropriately resourced and will put in place formal plans and protocols for internal and external communication and training by April 2026 to ensure a joined-up approach to sharing information with residents and wider housing management staff.</p> <p>This will help ensure support a positive safety culture, with people having the right skills and knowledge to</p>

17. Appendix 1 - Action Plan

High	Within six months
Medium	Within 12 months
Low	Before the end of the strategy (by April 2028)

Objective	Action	Description	By when?	Accountable	Responsible	Priority
1 Strengthen first line of defence within property compliance framework	1.	Develop and implement a plan to move all property compliance programmes away from Excel spreadsheets and on to QL.	October 2025	Interim Director of Housing Transformation	TBC	High
	2.	Undertake a data validation and cleansing exercise prior to migrating data to QL to ensure the data is accurate and provides one version of the truth.	August 2025	Director of Governance, Housing and Communities	Governance, Risk and Assurance Manager	High
	3.	Implement monthly data reconciliation across assets, compliance programmes and systems to ensure that records remain accurate and up to date.	September 2025	Interim Director of Housing Transformation	Compliance Manager	High
	4.	Implement sample checks of compliance records to ensure inspection dates are being captured correctly within each system	December 2025	Interim Service Improvement Lead	Compliance Manager	High
	5.	Develop policies, processes, and procedures to underpin the delivery of the compliance programmes.	July 2025	Director of Governance, Housing and Communities	Director of Governance, Housing and Communities	Medium

	6.	Implement a consistent approach to procuring contracts and undertaking contractor competency checks.	December 2025	Interim Director of Housing Transformation	Interim Service Improvement Lead	Medium
	7.	Set expected competence levels for internal team members managing and delivering compliance programmes.	December 2025	Interim Service Improvement Lead	Learning and Development Lead	Medium
2 Strengthen second line of defence within property compliance framework	8.	Develop a scorecard to strengthen property compliance reporting in line with Section 13 of the strategy and the requirements under the tenant satisfaction measures.	September 2025	Director of Governance, Housing and Communities	Governance, Risk and Assurance Manager	Medium
	9.	Develop and implement a consistent approach to escalating contractor non-performance and non-compliance escalation.	September 2025	Interim Director of Housing Transformation	Interim Service Improvement Lead	Medium

3 Strengthen third line of defence within property compliance framework.	10.	Implement an internal audit regime for the big six areas of compliance, and for damp and mould at least every two years.	October 2025	Director of Governance, Housing and Communities	SWAP	Low
	11.	Implement technical third-party quality assurance checks across all compliance areas to undertake sample checks on field work and desktop reviews on records. The auditors will be competent and appropriately qualified.	May 2026	Interim Service Improvement Lead	Compliance Manager	Medium
	12.	Consider commissioning an external compliance health check every two years	June 2026	Director of Governance, Housing and Communities	Director of Governance, Housing and Communities	Low
4 Strengthen our people and engagement to support our property compliance framework.	13.	Review our compliance team to make sure it is fit for purpose.	December 2025	Director of Governance, Housing and Communities	Interim Service Improvement Lead	High
	14.	Implement regular training for elected members and leaders on compliance assurance.	May 2026	Director of Governance, Housing and Communities	Learning and Development Lead	Low
	15.	Develop an internal protocol for sharing information and raise awareness of the importance of property compliance to improve knowledge and understanding and that we 'own it'	January 2026	Director of Governance, Housing and Communities	Housing Improvement Programme Lead	Medium

	16.	Implement the Customer Engagement plan to improve tenant oversight, scrutiny and engagement with compliance and safety in the home.	December 2025	Director of Governance, Housing and Communities	Director of Housing: Customer and Communities	Medium
	17.	Develop our Tenant and Leaseholder handbook and website information	June 2026	Director of Governance, Housing and Communities	Housing Improvement Programme Lead	Medium
	18.	Develop a resident communications plan for property compliance (such as gas safety week, summer months focus on water hygiene, barbeques on balconies, and heating safety in autumn/winter).	June 2026	Director of Governance, Housing and Communities	Housing Improvement Programme Lead	Low