

Slough Borough Council

HRA Tenanted Stock Landlord Compliance Strategy

1. Purpose and Scope

The purpose of this HRA Tenanted Stock Landlord Compliance Strategy is to

- Establish and maintain an effective system to plan and deliver landlord compliance activities to manage risk to Slough Borough Council's customers, staff, contractors and third parties in HRA premises owned and managed by the Council.
- Ensure compliance with the Statutory and Regulatory responsibilities as a Landlord and Employer and for which the Council are the 'Duty Holder'

This Strategy, the Policies, and the subsequent Management Plans arising are applicable to:

- All domestic properties within the Housing Revenue Account (General Needs Housing, Supported Housing, Sheltered Housing, and Homes in Multiple Occupation including Temporary Accommodation).
- All non-domestic properties within the Housing Revenue Account (Internal and External Communal Areas, Offices, Community Rooms, Garages and Remote Plant).

Further details will be provided within the Management Plans.

Other departments (non-Housing Revenue Account) domestic properties, for which Slough Borough Council is the Landlord, are not covered by this strategy.

Where properties are leased from, and managed on behalf of 3rd party property owners, statutory responsibility will be detailed within the terms of the lease / management agreement. Where the statutory responsibility lies with the property owner, Slough Borough Council must check that the appropriate certificates are in place, and be given assurance that they are safe before being occupied.

2. Framework

This Strategy is based on an interdependent framework of

- Resources
- A suite of Landlord Compliance Policies
- Procedures and Processes to deliver each Landlord Compliance Policy
- Data Control Protocols

- Performance Management
- Quality Assurance



3. Resources

- 3.1 The Cabinet and Chief Executive Officer will ensure that the Staff Structure, and any external resource engaged on the Organisation's behalf, includes the appropriate people and skills to meet Slough Borough Council's Landlord Compliance requirements.
- 3.2 Slough Borough Council will deliver appropriate levels of staff training to embed landlord compliance policies, procedures and processes into the culture of the organisation.
- 3.3 The activities required to deliver property compliance will be funded in the HRA Business Plan and Annual Budgets.

4. Landlord Compliance Policies

- 4.1 A suite of landlord compliance policies will be maintained and reviewed to ensure that statutory and regulatory requirements are met.
- 4.2 The big six Compliance Policies are appended to this HRA Compliance Strategy:
 - Appendix 1 – Gas Safety Policy
 - Appendix 2 – Fire Safety Policy
 - Appendix 3 - Asbestos Safety Policy
 - Appendix 4 – Electrical Safety Policy
 - Appendix 5 – Water Safety Policy

Appendix 6 – Lift Safety Policy

- 4.3 Other potential areas of consideration, and policy development are as follows which are predominantly within housing management as follows:
- Play areas (if within the HRA)
 - Trees (if within the HRA)
 - Communal area safety, slips and trips (estate management)
 - Personal fall protection systems (e.g. aids and adaptations)

- 4.4 Policies include a statement of intent, an outline of regulatory standards and legal obligations, objectives, and specific high level KPIs.

5. Procedures and Processes

- 5.1 A management plan will be in place for each area of landlord compliance incorporating procedures and processes to ensure consistency of approach in the delivery of landlord compliance responsibilities.
- 5.2 Procedures will provide clear guidance on Slough Borough Council's approach to delivery, roles and responsibilities, performance standards, controls, performance reporting and assurance.
- 5.3 Process maps will detail the key end to end processes mapped out in a simple coherent fashion.
- 5.4 We will monitor the implementation of the management plans through a series of metrics and report performance in a detailed process report.

6. Data Control Protocols

- 6.1 Slough Borough Council's core database will contain all asset information and the appropriate asset hierarchy to enable effective management of all Landlord Compliance areas.
- 6.2 The core database will contain all key asset and property data including the key attributes that require managing to ensure Slough Borough Council is compliant for every asset (e.g. gas, the location of lifts, fire risk assessment requirement, etc.)
- 6.3 A hierarchy will be established between the core database and all other databases and spreadsheets to ensure that all records are aligned to the master and updates are managed according to protocols.
- 6.4 All amendments to the core database (addition of new assets, demolition, sale and disposal of its assets, changes to the type of tenure etc.) will be effectively managed and documented in line with the approved Data Protocol.

7. Performance Management

- 7.1 Landlord compliance policies and management plans will ensure that there will be visibility of performance at the appropriate levels in the business.
- 7.2 Reports on the current level of compliance will be managed by the Repairs Maintenance and Investment (RMI) Contract Client Team and reported through the governance of the RMI contract with Osborne Property Services Ltd and Slough Borough Council's own governance arrangements.

Reporting will be at appropriate frequencies and to the following key groups within the organisation

- RMI Contract Client Team via RMI operational meetings
- Heads of Housing Development & Contracts and Housing (People) Services via RMI Operational Management Board
- Cabinet Member for Housing and Community Safety via RMI Strategic Management Board (and member updates)
- Health & Safety Board
- Corporate Management Team
- Neighbourhood & Community Services Scrutiny Panel
- The Cabinet

	RMI Client Team	Heads of HDC & HPS	Cabinet Member for Housing	H&S Board	CMT	NCS Scrutiny	Cabinet
PI	Weekly	Weekly	As requested	As requested	As requested		
KPI	Weekly	Weekly	Monthly	Monthly	Monthly*	Quarterly	Six Monthly
Progress Report	Monthly	Monthly	Quarterly	Quarterly	Quarterly*	Six Monthly	Annually

*CMT will initially monitor on the same frequency and level of detail as H&S Board whilst the new approach is embedded. This will then move to reporting by exception on these frequencies with full reporting on the same frequency as Scrutiny Committee.

8. Escalation and Reporting of incidents

- 8.1 Incidents in relation to HRA stock will be reported to the RMI Client Team by Osborne or other agency. The RMI Client Team will identify if the incident presents a reputational or financial risk to the council and escalate the matter to CMT and the Corporate Communications Team. Remedial action will be taken via Osborne by the Client team.
- 8.2 Where a third party agency is involved, actions will be agreed and reported to the Health & Safety Board as part of the monthly reporting process. Actions will be agreed and monitored with the agency, Appendix 7 sets out the process for escalation and reporting of incidents.

9. Quality Assurance

- 9.1 Appropriate independent external audit arrangements will be established to test the quality of the outputs across all areas of Landlord Compliance and to give the Cabinet, as Duty Holder, reasonable assurance in relation to the level of compliance.
- 9.2 An Internal Audit Programme will test all areas of Landlord Compliance in the first twelve months following approval of the Management Plans and thereafter a programme will be set up using the following frequencies based on the level of risk to the organisation. These frequencies will be subject to review based on risk.

Compliance Area	Frequency
Gas	Annually
Fire	Annually
Electricity	Two yearly
Water	Two yearly
Asbestos	Three yearly
Lifts	Three yearly

- 9.3 The Quality Assurance process will have a clear link to Slough Borough Council's Risk Register.
- 9.4 A report will be prepared annually for Scrutiny Committee and the Cabinet confirming the outcome of both internal and external Quality Assurance checks.
- 9.5 The Cabinet are required to seek appropriate assurance that this strategy is being implemented.

10. Conclusion

Effective implementation and delivery of this Strategy will assist in ensuring that Slough Borough Council meets its Statutory and Regulatory requirements in relation to Landlord Compliance.

- Appendix 1 – Gas Safety Policy
- Appendix 2 – Fire Safety Policy
- Appendix 3 - Asbestos Safety Policy
- Appendix 4 – Electrical Safety Policy
- Appendix 5 – Water Safety Policy
- Appendix 6 – Lift Safety Policy
- Appendix 7 – HRA Tenanted Stock Health & Safety Incident Escalation Reporting