



Executive Committee

Tue 10 Jun
2025
6.30 pm

Oakenshaw Community
Centre, Castleditch
Lane, B98 7YB



If you have any queries on this Agenda please contact
Jess Bayley-Hill

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GUIDANCE ON FACE-TO-FACE MEETINGS

If you have any questions regarding the agenda or attached papers, please do not hesitate to contact the officer named above.

Notes:

Although this is a public meeting, there are circumstances when Council might have to move into closed session to consider exempt or confidential information. For agenda items that are exempt, the public are excluded.

Executive

Tuesday, 10th June, 2025

6.30 pm

Oakenshaw Community Centre

Agenda

Membership:

Cllrs:	Sharon Harvey (Chair)	Bill Hartnett Jen Snape
	Jane Spilsbury (Vice-Chair)	Monica Stringfellow Ian Woodall
	Juliet Barker Smith Juma Begum	

1. Apologies

2. Declarations of Interest

To invite Councillors to declare any Disclosable Pecuniary Interests and / or Other Disclosable Interests they may have in items on the agenda, and to confirm the nature of those interests.

3. Leader's Announcements

4. Minutes (Pages 5 - 12)

5. Warm Homes Local Grants Funding and Resources (Pages 13 - 20)

6. Housing Ombudsman Self-Assessment Complaint Handling Code (Pages 21 - 82)

This item is due to be the subject of pre-scrutiny at a meeting of the Overview and Scrutiny Committee scheduled to take place on 9th June 2025. Any recommendations arising from that meeting will be published in a supplementary pack for the consideration of the Executive Committee.

7. Housing Regulator Tenant Satisfaction Measures (Pages 83 - 110)

8. Shareholders Committee Annual Report (Pages 111 - 124)

This item is due to be the subject of pre-scrutiny at a meeting of the Overview and Scrutiny Committee scheduled to take place on 9th June 2025. Any recommendations arising from that meeting will be published in a supplementary pack for the consideration of the Executive Committee.

Executive

Tuesday, 10th June, 2025

9. Appointments to the Shareholders Committee (Pages 125 - 128)

10. Overview and Scrutiny Committee (Pages 129 - 140)

11. Minutes / Referrals - Overview and Scrutiny Committee, Executive Panels etc.

To receive and consider any outstanding minutes or referrals from the Overview and Scrutiny Committee, Executive Panels etc. since the last meeting of the Executive Committee, other than as detailed in the items above.

12. To consider any urgent business, details of which have been notified to the Head of Legal, Democratic and Property Services prior to the commencement of the meeting and which the Chair, by reason of special circumstances, considers to be of so urgent a nature that it cannot wait until the next meeting

13. Exclusion of the press and public

Should it be necessary, in the opinion of the Chief Executive, during the course of the meeting to consider excluding the public from the meeting on the grounds that exempt information is likely to be divulged, it may be necessary to move the following resolution:

“That, under S.100 (A) (4) of the Local Government Act 1972, the public be excluded from the meeting for the following matter(s) on the grounds that it/they involve(s) the likely disclosure of exempt information as defined in the relevant paragraphs (to be specified) of Part 1 of Schedule 12 (A) of the said Act”.

These paragraphs are as follows:

Subject to the “public interest” test, information relating to:

- Para 3 – financial or business affairs;
 - Para 4 – labour relations matters;
- and may need to be considered as ‘exempt’.

14. Promoting Independent Living Service (Pages 141 - 182)



Executive Committee

Tuesday, 13th May, 2025

MINUTES

Present:

Councillor Sharon Harvey (Chair), and Councillors Juliet Barker Smith, Bill Hartnett, Jen Snape, Jane Spilsbury, Monica Stringfellow and Ian Woodall

Also Present:

Councillor Juma Begum

Officers:

Ruth Bamford, Neil Batt, Rachel Egan, Claire Holmes, John Leach and Bob Watson

Democratic Services Officers:

Jo Gresham

102. APOLOGIES

There were no apologies for absence. The Chair explained that although Councillor W. King's name appeared on the agenda for this meeting, she was no longer a member of the Executive Committee. It was confirmed that the agenda had been published prior to notification of this change.

103. DECLARATIONS OF INTEREST

There were no declarations of interest.

104. LEADER'S ANNOUNCEMENTS

The Chair advised that at the meeting of the Overview and Scrutiny Committee held on Monday 12th May 2025, Members had pre-scrutinised the Redditch Local Plan and the DMIC (Digital Manufacturing and Innovation Centre) Additional Design Costs (AHR Architects Contract Variation) reports, scheduled for

Chair

consideration at the Executive Committee meeting. Members were advised at the end of their discussions, the Committee endorsed the recommendations in the reports but did not propose any further recommendations.

On behalf of the Executive Committee, the Chair thanked the members of the Overview and Scrutiny Committee for their hard work in pre-scrutinising these reports.

105. MINUTES

RESOLVED that

The minutes of the meeting of the Executive Committee held on 11th March 2025 be approved as a true and accurate record and signed by the Chair.

106. REDDITCH LOCAL PLAN

The Assistant Director Planning, Leisure & Cultural Services presented the Redditch Local Plan report for Members' consideration.

In doing so, the Committee were informed that this report had been considered extensively by Members at Planning Advisory Panel (PAP) meetings. In addition to this, it had also been considered at a recent Portfolio Holder Briefing meeting and as highlighted earlier at this meeting, had been pre-scrutinised by the Overview and Scrutiny Committee at the meeting held on 12th May 2025.

Members were informed that Executive Committee were asked to recommend formally to Council that the Redditch Local Plan Issues and Options Consultation document be endorsed in order for it to put out for consultation throughout the Borough for a six-week period.

It was also recommended that delegated authority be granted to the Assistant Director Planning & Leisure Services, following consultation with the Portfolio Holder, to allow any necessary minor technical corrections and editorial changes deemed necessary to aid the understanding of document prior to the final publishing. It was noted that the consultation period would commence on 22nd May 2025 and run for a six-week period until 3rd July 2025.

Following presentation of the report the Chair reiterated that this report had been considered in detail by Members across several meetings in recent months. The Overview and Scrutiny Committee were thanked once again for pre-scrutinising the report at the Committee meeting held on the previous evening.

It was noted by Members that, although the Redditch Local Plan Issues and Options Consultation document would be subject to consultation, the Council was not bound to the outcomes of the consultation. This was more of an opportunity to gather a wide range of views across Redditch which could potentially inform the Plan going forward.

The software package, Commonplace, had been procured in order to collect the data effectively and provided greater flexibility for residents to access the consultation on their smartphones, including interactive mapping tools. It was hoped that this would increase engagement with younger residents within the Borough, who were historically 'harder to reach' in these types of consultations. It was confirmed that there would also be non-digital consultation methods available for residents who did not use this technology. These included face to face stakeholder meetings with Planning Officers at local village halls and in the market area in the Town Centre.

Members queried the timeline for the consultation plan. Officers undertook to provide this information Members following the meeting.

Consideration was given to what the design code included in the Local Plan was likely to be. It was clarified that design code was not strictly part of the Local Plan. However, through stakeholder consultation there would be the opportunity to shape and influence some design characteristics and for Officers to present ideas on what good design looked like. The Assistant Director Planning & Leisure Services stated that there would be a 'daughter document' produced in the future that would invite people to comment on any potential design code.

Members queried whether the current 'Vision' statement included in the Redditch Issues and Options Consultation document was flexible. Officers informed the Committee that this would and should change as the consultation process progressed and developed.

Executive Committee

Tuesday, 13th May, 2025

Some Members suggested that Destination Redditch be included within any future iterations of the Vision statement. It was clarified that there would be the opportunity for areas such as an aspiration for tourism to be included in the final document. However, consultation on such matters was important as some residents might have differing options on an increase in people travelling to Redditch for tourism purposes. For example some residents might be in favour of greater use of the Borough's open spaces by those who did not live in Redditch to increase economic development, however some may feel it was detrimental to the area as it might increase traffic. Therefore, the consultation would provide greater clarity in the aspirations and needs of the local residents.

RECOMMENDED that

- 1) The Council endorse Redditch Local Plan Issues and Options consultation document (Appendix A) for a six-week public consultation period.**
- 2) That delegated authority be given to the Assistant Director for Planning, Leisure and Culture Services following consultation with the Portfolio Holder for Planning, Regeneration and Governance to make any minor technical corrections and editorial changes deemed necessary to aid the understanding of the documentation prior to final publishing.**

107. OVERVIEW AND SCRUTINY COMMITTEE

The Chair noted that there were no outstanding recommendations from the meeting of the Overview and Scrutiny Committee held on 10th March 2025 which required the Executive Committee's consideration.

RESOLVED that

the minutes of the meeting of the Overview and Scrutiny Committee held on 10th March 2025 be noted.

108. MINUTES / REFERRALS - OVERVIEW AND SCRUTINY COMMITTEE, EXECUTIVE PANELS ETC.

Executive Committee

Tuesday, 13th May, 2025

There were no referrals from the Overview and Scrutiny Committee or any of the Executive Advisory Panels on this occasion.

109. TO CONSIDER ANY URGENT BUSINESS, DETAILS OF WHICH HAVE BEEN NOTIFIED TO THE HEAD OF LEGAL, DEMOCRATIC AND PROCUREMENT SERVICES PRIOR TO THE COMMENCEMENT OF THE MEETING AND WHICH THE CHAIR, BY REASON OF SPECIAL CIRCUMSTANCES, CONSIDERS TO BE OF SO URGENT A NATURE THAT IT CANNOT WAIT UNTIL THE NEXT MEETING

There was no Urgent Business on this occasion.

110. DMIC (DIGITAL MANUFACTURING AND INNOVATION CENTRE) ADDITIONAL DESIGN COSTS (AHR ARCHITECTS CONTRACT VARIATION)

The Regeneration Project Delivery Manager presented the DMIC (Digital Manufacturing and Innovation Centre) Additional Design Costs (AHR Architects Contract Variation) for Members' consideration.

In doing so, Members were reminded that Redditch had been awarded an investment of £15.6 million in 2021 through the Towns Fund. The investment had been allocated to three projects as follows:

- Digital Manufacturing Innovation Centre (£8,000,000)
- Redevelopment of Redditch Library Site (£4,200,000)
- Redditch Public Realm (£3,000,000)

Due to a change in priorities of the current Council administration, the redevelopment of the Redditch Library site project was no longer progressing. This had resulted in £4,200,000 underspend in the funding allocation. It had subsequently been agreed by the Ministry of Housing, Communities and Local Government (MHCLG) that £3,937,000 of this underspend could be utilised as further funding for the DMIC project. The remaining underspend totalling £263,000 would be allocated to the Public Realm project.

The additional funding would be used to fund an expansion to the DMIC which would require additional design, civil engineering and architecture costs. It was confirmed that the Redditch Town Deal

Executive Committee

Tuesday, 13th May, 2025

Board had agreed these proposed changes and that contingency funds had also been included in the funding allocation in order to mitigate any potential issues in the future.

The report also requested that the costs for Gardiner and Theobald (G&T) to provide project management services be increased to £250,000.

Members were informed that both AHR Architects and G&T were originally procured within the Procure Partnerships framework. As a result of the changes to the projects this framework has been revisited in conjunction with the Council's legal and procurement teams. The outcome of this was that both AHR Architects and G&T continued to provide value for money due to prior knowledge of the projects.

Following the presentation of the report, Members thanked the Officers for their hard work on this project, which would be an asset to Redditch. The inclusion of a contingency within the budgets was welcomed and it was felt that this was prudent for such a large project.

Members raised questions in respect of the funding from the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP), which had also been raised at the Overview and Scrutiny Committee meeting the previous evening. It was confirmed that a bid would be made for the funding which would be assessed. Once this had been through the appropriate governance process it was hoped that the funding would be allocated accordingly.

RESOLVED that

- 1) AHR Architects design team costs are increased up to a maximum of £1,450,000 for design of Redditch Digital Manufacturing and Innovation Centre (DMIC);**
- 2) Costs for Gardiner and Theobald (G&T) project management services for the DMIC are increased up to a maximum of £250,000.**

RESOLVED to NOTE

Executive Committee

Tuesday, 13th May, 2025

- 3) Any draw down of contingency is subject to approval by the Deputy Chief Executive (Section 151 Officer) in conjunction with the Assistant Director for Regeneration and Property.
- 4) that the additional funding at recommendations 1 and 2 above utilises reallocated central government grant monies.

The Meeting commenced at 6.30 pm
and closed at 6.57 pm

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**Executive
Committee**

10/06/2025

Warm Homes Grant Funding and resources

Relevant Portfolio Holder	Councillor Jen Snape
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Judith Wills
Report Author	Job Title: Climate Change Manager Contact email: matthew.eccles@bromsgroveandredditch.gov.uk Contact Tel: 07816112073
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Green, Clean & Safe Redditch
Non - Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Executive Committee is asked to **RECOMMEND** that: -

- 1) Authority be delegated to the Deputy Chief Executive and Chief Finance Officer to reflect in the Capital Programme the grant funding in 2025/26 and to include the 2026/27 and 2027/28 funding into the Medium-Term Financial Plan for the Warm Homes Local Grant (WHLG) (as shown below).**

Year 1 2025/26	Year 2 2026/27	Year 3 2027/28
£63,576.92	£261,000	£252,300

The Executive Committee is asked to **RESOLVE** that

- 2) Authority be delegated to the Assistant Director of Community and Housing Services following consultation with the Portfolio Holder for Climate Change and Biodiversity to administer the funding received in the WHLG in line with the grant conditions and any alterations to the delivery programme.**

2. BACKGROUND

- 2.1** The Warm Homes: Local Grant scheme, was launched in April 2025, aims to provide energy performance upgrades and low carbon heating to low-income households in England. The scheme targets homes with

Executive Committee

10/06/2025

an Energy Performance Certificate (EPC) rating between D and G that are privately owned. Social housing is not eligible, however, separate funding from the Government is being made available for this tenure. Local authorities will deliver measures such as insulation, solar panels, and air source heat pumps, tailored to individual homes. Occupants on a low income will not contribute to the cost of these upgrades.

- 2.2 The Warm Homes Local Grant (WHLG) provides an opportunity for Redditch Borough Council to directly address fuel poverty and improve the energy efficiency of homes within the Borough. By retrofitting homes with energy-saving measures, Redditch Borough Council can work towards achieving the authority's climate goals, enhance the well-being of residents, and create employment in the green sector.
- 2.3 This programme is a key component of the Government's broader strategy to achieve Net Zero emissions by 2050 and ensure that all homes meet minimum energy efficiency standards by 2030.

3. OPERATIONAL ISSUES

- 3.1 Officers are proposing that the initial project delivery will focus on the Woodrow area, which features a mix of tenures and allows for a collaborative approach with Redditch Borough Council Housing Service using both WHLG and the separate Warm Homes Social Housing Fund (WHSHF).
- 3.2 The eligibility for the WHLG scheme is below
- IMD:ID Eligible Postcodes: Households located in postcodes that fall within the most deprived 25% according to the Index of Multiple Deprivation (IMD) are eligible. These households are classified as auto eligible; or
 - Households with a gross income below £36,000 per year or a net income of £20,000 or less after housing costs or households must be classified as low-income, which can be demonstrated by receiving specific means-tested benefits and;
 - Properties must have an EPC rating between D and G.
- 3.3 Act on Energy have been selected by the Midlands Net Zero Hub (MNZH) to provide the customer engagement in our area and Officers will work in partnership with them to leverage their expertise in

**Executive
Committee**

10/06/2025

engaging residents and encourage applications for the programme through the owner-occupier part of the programme to ensure residents are engaged.

- 3.4 Officers will undertake a joint exercise with Housing Services to employ a qualified and experienced Retrofit Assessor and Coordinator. The Council will also go out to procure a qualified and experienced PAS 2035 retrofit installer/contractor to undertake the retrofit works. This will include a clear specification for the retrofit measures to be delivered, emphasising quality and value for money, as well as experience of working across multiple grant schemes.
- 3.5 Officers will be required to supply monthly progress and financial reports to MNZH the consortium lead, on the progress, to ensure transparency and alignment with the overall programme goals.
- 3.6 Based on an average cost per home of £15,000, the WHLG funding can be utilised to retrofit approximately 38 homes (£576,876.92 / £15,000 per home)

The potential number of homes that can be retrofitted in each year based on the funding allocation for each year is:

Year 1	Year 2	Year 3
4	17	16

4. FINANCIAL IMPLICATIONS

- 4.1 MNZH have advised the funding allocation is £576,876.92 (including £57,687.69 for administrative and ancillary costs) over 3 years
- 4.2 The funding is split into the following amounts per year

Year 1	Year 2	Year 3
£63,576.92	£261,000	£252,300

5. LEGAL IMPLICATIONS

- 5.1 The Council will need to agree and sign the grant agreement form to receive the funding. It is proposed that this should be delegated to Officers to complete on behalf of the Council.

Executive Committee

10/06/2025

- 5.2 The Council will need to enter into contracts with qualified retrofit installers and service providers to ensure compliance with PAS 2035 standards. This will need to be delivered in line with the Council's procurement process.

6. OTHER - IMPLICATIONS

Local Government Reorganisation

- 6.1 There are no expected implications for local government reorganisation.

Relevant Council Priority

- 6.2 The Warm Homes Local Grant (WHLG) project directly aligns with the Council priority of Green, Clean and Safe Redditch and Housing and Community. By improving the energy efficiency of homes and reducing carbon emissions, the project contributes to creating a clean and green environment. Additionally, addressing fuel poverty and enhancing resident well-being supports sustainable development and improves the overall quality of life for the community. This initiative also fosters economic growth through job creation in the green sector and promotes the council's commitment to achieving Net Zero carbon emissions by 2040.

Climate Change Implications

- 6.3 Residential energy consumption is a significant contributor to carbon emissions. Improving home energy efficiency is crucial to achieving net-zero goals.
- 6.4 Enhanced home energy efficiency can lead to improved health outcomes for residents by reducing exposure to cold and damp conditions.

Equalities and Diversity Implications

- 6.4 The WHLG program targets households most affected by high energy costs, helping to alleviate fuel poverty and its associated health and social inequalities.
- 6.5 The programme will ensure that all eligible residents, regardless of background, have access to the benefits of the retrofit measures.

Executive Committee

10/06/2025

7. RISK MANAGEMENT

7.1 Identified Risks and Mitigation Strategies:

1. Lack of Resident Participation:

- Risk: Insufficient resident engagement may lead to low participation in the WHLG program.
- Mitigation: Develop and implement a comprehensive engagement strategy, including outreach and education efforts, to encourage resident participation. Utilise partnerships with community groups and Act on Energy to increase awareness and involvement.

2. Challenges in Finding Qualified Contractors:

- Risk: Difficulty in securing suitably qualified and experienced contractors to undertake retrofit works.
- Mitigation: Conduct a robust procurement process to secure experienced PAS 2035 retrofit installers/contractors. Establish a reserve list of qualified professionals to ensure project continuity.

3. Supply Chain Issues for Retrofit Materials:

- Risk: Disruptions in the supply chain may lead to delays in obtaining necessary materials for retrofit works.
- Mitigation: Monitor supply chain trends and establish contingency plans for securing retrofit materials. Engage with multiple suppliers to diversify sources and minimize risk.

4. Overspending or Financial Mismanagement:

- Risk: The project may exceed its budget or face financial mismanagement.
- Mitigation: Implement strict financial monitoring and reporting processes. Submit regular financial reports to MNZH to ensure adherence to the budget and transparency.

5. Delays in Project Delivery:

- Risk: The project may face delays in implementation, affecting timelines and outcomes.
- Mitigation: Develop a detailed project timeline with built-in contingencies to address potential delays. Maintain regular communication with contractors and stakeholders to ensure timely progress.

6. Negative Publicity or Community Dissatisfaction:

- Risk: Issues during the project may lead to negative publicity or community dissatisfaction.

**Executive
Committee**

10/06/2025

- Mitigation: Maintain transparent communication with the community throughout the project. Address any concerns or feedback promptly and effectively to build trust and support.

7. Poor Quality Work Being Delivered:

- Risk: The quality of retrofit works may not meet required standards, leading to dissatisfaction and potential rework.

- Mitigation: Conduct regular quality checks and inspections throughout the retrofit process. Ensure contractors adhere to PAS 2035 standards and address any issues promptly.

8. Complexity of Working Across Two Grant Funding Streams:

- Risk: Managing both the WHLG and WSHF funding streams may lead to administrative complexities and potential overlaps.

- Mitigation: Establish clear guidelines and protocols for managing both funding streams. Ensure coordination and communication between teams to streamline processes.

9. Misunderstanding of Eligibility Requirements by Residents:

- Risk: Residents may misunderstand the eligibility requirements for the WHLG program.

- Mitigation: Provide clear and accessible information to residents about eligibility requirements. Offer assistance through community engagement events and support from Act on Energy.

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Jen Snape	Please add the date Councillor Snape considered this here.
Lead Director / Assistant Director	Judith Wills	19/05/2025
Financial Services	Bob Watson	19/05/2025

**Executive
Committee**10/06/2025

Legal Services	Nicola Cummings, Principal Solicitor - Governance	21/05/2025
Climate Change Team (if climate change implications apply)	Matthew Eccles, Climate Change Manager	19/05/2025

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REDDITCH BOROUGH COUNCIL**Executive Committee
2025****10 June****Housing Ombudsman Self-Assessment Complaint Handling**

Relevant Portfolio Holder	Councillor Bill Hartnett
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Judith Willis
Report Author – Matthew Bough	Job Title: Strategic Housing Service & Business Support Manager Contact email: matthew.bough@bromsgroveandredditch.gov.uk Contact Tel: 01527 64252 ext:3120
Wards Affected	All
Ward Councillor(s) consulted	
Relevant Council Priority	Community & Housing
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS**The Executive Committee RESOLVE that:-**

- 1) The Housing Complaint Self-Assessment (Appendix 1) is approved;**
- 2) Annual Complaints Performance and Service Improvement Report 2024-25 (Appendix 2) is approved;**
- 3) The Housing Complaints Standard (Appendix 3) is approved and;**

The Executive Committee is asked to NOTE that

- 4) The reports referred to at resolutions 1 to 3 above, will be published to the Council's website.**

2. BACKGROUND

- 2.1 The Housing Ombudsman is a non-departmental public body sponsored by the Ministry of Housing, Communities and Local Government (MHCLG). Its role is to resolve disputes involving members of the Housing Ombudsman Service, including making awards of compensation or other remedies when appropriate
- 2.2 All Local Authorities that are Registered providers of Social Housing are required to be a member of the Housing Ombudsman Scheme. A condition of the scheme is that members must have a complaint

**Executive Committee
2025****10 June**

handling procedure which must satisfy the requirements of the Housing Ombudsman complaint handling code which became mandatory from April 2024.

- 2.3 The Housing Service must also report on performance and provide information on continuous improvement as a result of learning from complaints.

3. OPERATIONAL ISSUES**Complaint Self-Assessment**

- 3.1 The Housing Ombudsman Complaint Handling Code 2024 requires at section 8.1 that members undertake a self-assessment of its complaint handling scheme as part of its annual complaint performance and service improvement report.
- 3.2 The purpose of the self-assessment is to set out how landlords demonstrate their complaint handling complies with the provisions of the Code.
- 3.3 Completion of the self-assessment typically requires landlords to:
- Review current practices to identify any gaps or actions required to comply
 - Take any necessary action to ensure that Code requirements are met
 - Gather and document evidence to support the assessment of compliance
 - Scrutinise and challenge the assessment, to provide assurance
 - Publish the self-assessment and wider documentation
 - Communicate and embed changes made through the self-assessment
- 3.4 The self-assessment has been completed by officers and has been reviewed by the Council Leadership Team and is attached at Appendix 1.
- 3.5 On completing the self-assessment Officers identified that for Stage 2 complaints, the Housing Complaints Standard was not specific on reasons to refuse a stage 2 request and on occasion the decision not to accept an escalation was made for the wrong reasons.
- 3.6 The Housing Complaints Standard has been amended to improve the process and ensure this does not occur in the future. This has been

**Executive Committee
2025****10 June**

relayed to Officers through the Housing Department Management Team Meetings.

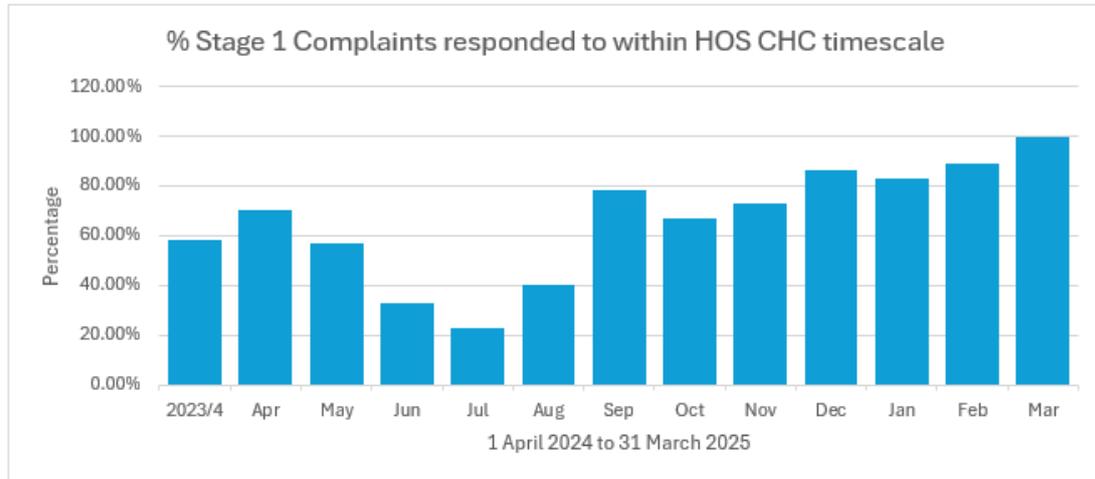
Annual complaints performance and service improvement report

- 3.7 The Housing Service is committed to providing an excellent service for its customers, but the Council recognises that the authority does not always get it right. The Council recognises that customers have a right to complain when they feel the authority has fallen short of their expectations.
- 3.8 As well as giving the Council the chance to put things right, complaints provide valuable feedback on the authority's services that help Officers to continually improve services by identifying root causes, learning from complaints, making improvements and developing a positive complaint culture.
- 3.9 The following tables provide statistics around quantity and types of complaints received, numbers closed and upheld, and the percentage responded within the timescale set out by the Housing Ombudsman's Complaint Handling Code:

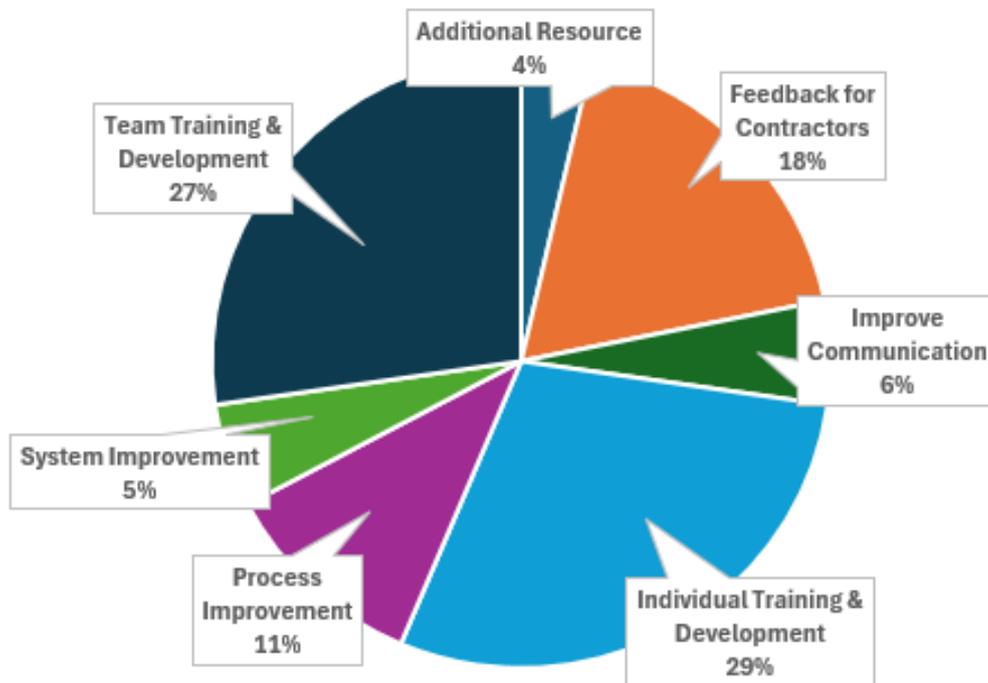
Complaints	Housing Services			Housing Property Services			Total
	N&T	V&A	Revenue	A&A	R&M	Capital	
Stage 1 Received	21	1	4	3	71	19	124
Stage 1 Closed	23	2	5	3	74	17	127
Stage 1 upheld/partially upheld	5	1	2	2	39	7	56
Stage 2 received	6	0	1	0	11	3	21
Ombudsman received	2	0	0	0	7	1	10

N&T = Neighbourhood & Tenancy A&A = Aids & Adaptations
 V&A = Voids & Allocations R&M = Repairs & Maintenance

- 3.10 The graph below shows the percentage of complaints responded to within the Housing Ombudsman code requirements including the figures for 2023/24 for comparison. Due to the declining performance in the first quarter, a dedicated complaints investigator has been introduced in Housing Property Services from August 2025 to improve complaints handling performance.

**Executive Committee
2025****10 June**

3.11 Between 1st April 2024 and 31st March 2025, 55 learning outcomes were recorded because of complaints that were fully and partially upheld, the learning types and number presented are as follows:



3.12 Between 1st April 2024 and 31st March 2025 the Council received three determinations where the Housing Ombudsman fully or partially upheld a complaint following an intervention.

3.13 The Housing Complaints Standard clearly sets out the complaint handling principles managers need to apply when investigating a

REDDITCH BOROUGH COUNCIL**Executive Committee
2025****10 June**

complaint. The standard also provides guidance for managers in how to set out their response to ensure all points are addressed and appropriate remedies are considered. Letter templates have been produced to ensure a consistent complaint response.

4. FINANCIAL IMPLICATIONS

- 4.1 Compensation was paid to complainants in nine Stage 1 complaints totalling £1,795.21.

5. LEGAL IMPLICATIONS

- 5.1 The annual report, self-assessment and service improvement plan is required under the statutory Complaint Handling Code as per the Social Housing (Regulation) Act 2023.

6. OTHER - IMPLICATIONS**Local Government Reorganisation**

- 6.1 There are no implications from Local Government Reorganisation. Any new local authority will be required to follow the requirements of the Social Housing (Regulation) Act 2023 if it is a stock holding authority.

Relevant Council Priority

- 6.2 The Housing Complaints Standard supports the Council's priority of Community and Housing ensuring that tenants live in well maintained homes and receive a quality housing service.

Climate Change Implications

- 6.3 There are no climate change implications from this report.

Equalities and Diversity Implications

- 6.4 The report is being designed in a more accessible format to ensure tenants can access and digest the details contained within it.

7. RISK MANAGEMENT

- 7.1 The Housing Service wants the complaint process to be easily accessible for residents and does not view complaints as a negative. It is important to know when things go wrong so that the authority can put

REDDITCH BOROUGH COUNCIL**Executive Committee
2025****10 June**

them right and learn from mistakes. This approach enables the Council to continually improve what Officers do by identifying the root causes, learning from complaints, making improvements and developing a positive complaint culture.

- 7.2 Failure in following the Housing Ombudsman Code can lead to various consequences for landlords, including Complaint Handling Failure Orders (CHFOs) and potential reporting to the Regulator for Social Housing.
- 7.3 Complaints are a standing agenda item on the Housing Directorate Management Team meeting to ensure complaints are dealt with effectively and reported as required.

8. APPENDICES and BACKGROUND PAPERS

Appendix 1 - Housing Complaint Self-Assessment 2024/25

Appendix 2 - Annual Complaints Performance and Service Improvement Report 2024-25

Appendix 3 - Housing Complaints Standard

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Bill Hartnett, Portfolio Holder for Housing	21/05/2025
Lead Director / Assistant Director	Judith Willis, Assistant Director of Community and Housing Services	.
Financial Services	Bob Watson, Deputy Chief Executive and Chief Finance Officer	22/05/2025
Legal Services	Nicola Cummings, Principal Solicitor – Governance	19/05/2025

Appendix A: Self-assessment form

This self-assessment form should be completed by the complaints officer and it must be reviewed and approved by the landlord's governing body at least annually.

Once approved, landlords must publish the self-assessment as part of the annual complaints performance and service improvement report on their website. The governing body's response to the report must be published alongside this.

Landlords are required to complete the self-assessment in full and support all statements with evidence, with additional commentary as necessary.

We recognise that there may be a small number of circumstances where landlords are unable to meet the requirements, for example, if they do not have a website. In these circumstances, we expect landlords to deliver the intentions of the Code in an alternative way, for example by publishing information in a public area so that it is easily accessible.

Section 1: Definition of a complaint

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
1.2	<p>A complaint must be defined as:</p> <p><i>‘an expression of dissatisfaction, however made, about the standard of service, actions or lack of action by the landlord, its own staff, or those acting on its behalf, affecting a resident or group of residents.’</i></p>	Yes	<p>This is clearly set out in point 4.1 of the Complaints Standard which states: “A complaint is any expression of dissatisfaction, however made, about the standard of service, actions, or lack of action, by the Housing Service, its own staff, or those acting on its behalf (such as a partner or contractor), affecting and individual resident or group of residents and that requires a response.”</p>	
1.3	<p>A resident does not have to use the word ‘complaint’ for it to be treated as such. Whenever a resident expresses dissatisfaction landlords must give them the choice to make complaint. A complaint that is submitted via a third party or representative must be handled in line with the landlord’s complaints policy.</p>	Yes	<p>This is set out within point 4.3 of the Complaints Standard which states: “The word “complaint” does not have to be explicitly used for it to be treated as such. The Housing Reviews and Complaints Team will make initial contact with the resident or service user and clarify with them if they wish for it to be a complaint to be handled in line with the Complaints Standard, or if it is a service request.”</p>	

			points 5.1 and 8.13 reference complaints submitted via third parties.	
1.4	Landlords must recognise the difference between a service request and a complaint. This must be set out in their complaints policy. A service request is a request from a resident to the landlord requiring action to be taken to put something right. Service requests are not complaints, but must be recorded, monitored and reviewed regularly.	Yes	This is explained in point 4.3 of the Complaints Standard which states: <i>“The Housing Reviews and Complaints Team will make initial contact with the resident or service user and clarify with them if they wish for it to be a complaint to be handled in line with the Complaints Standard, or if it is a service request, whereby a resident or service user is unhappy with a situation that they wish to have rectified, and co-ordinate accordingly.”</i>	Where it is established that the complaint is actually a request for service, it is then distributed to the relevant team/service area for logging, monitoring and reviewing in line with their internal processes.
1.5	A complaint must be raised when the resident expresses dissatisfaction with the response to their service request, even if the handling of the service request remains ongoing. Landlords must not stop their efforts to address the service request if the resident complains.	Yes	This is referred to in point 8.10 of the Complaints Standard which states: <i>“Outstanding actions must still be tracked and actioned expeditiously, with regular updates provided to the resident, service user or their representative.”</i>	
1.6	An expression of dissatisfaction with services made through a survey is not defined as a complaint, though wherever possible, the person completing the survey should be made	Yes	This is clearly explained in point 6.1 of the Complaints Standard which states: <i>“Survey feedback and requests for service, need not be treated as</i>	

	aware of how they can pursue a complaint if they wish to. Where landlords ask for wider feedback about their services, they also must provide details of how residents can complain.		<i>complaints, however, where possible, the Council will make the respondent aware of how they can pursue their dissatisfaction as a complaint if they wish to."</i>	
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Section 2: Exclusions

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
2.1	Landlords must accept a complaint unless there is a valid reason not to do so. If landlords decide not to accept a complaint they must be able to evidence their reasoning. Each complaint must be considered on its own merits	Yes	<p>This is stipulated in point 6.2 of the Complaints Standard which states <i>“If the Council decides not to accept a complaint, a detailed explanation must be provided to the complainant or their representative, setting out the reasons why the matter is not suitable for the complaints processes”</i></p> <p>Point 8.13 of the Complaints Standard describes the complaint handler’s commitment to <i>“Approach all complaints acting independently, sensitively and with an open mind free of bias, prejudice, or conflict of interest.”</i></p>	
2.2	A complaints policy must set out the circumstances in which a matter will not be considered as a complaint or escalated, and these circumstances must be fair and reasonable to	Yes	<p>Point 6.1 of the Complaints Standard lists exclusions.</p>	

	<p>residents. Acceptable exclusions include:</p> <ul style="list-style-type: none"> • The issue giving rise to the complaint occurred over twelve months ago. • Legal proceedings have started. This is defined as details of the claim, such as the Claim Form and Particulars of Claim, having been filed at court. • Matters that have previously been considered under the complaints policy. 			
2.3	<p>Landlords must accept complaints referred to them within 12 months of the issue occurring or the resident becoming aware of the issue, unless they are excluded on other grounds. Landlords must consider whether to apply discretion to accept complaints made outside this time limit where there are good reasons to do so.</p>	Yes	<p>This is clearly explained in point 6.1 of the Complaints Standard which states: <i>“Complaints made more than one year after the resident or service user became aware of the issue (unless there are exceptional circumstances), due to the passage of time.”</i></p>	
2.4	<p>If a landlord decides not to accept a complaint, an explanation must be provided to the resident setting out the reasons why the matter is not suitable for the complaints process and the right to take that decision to the Ombudsman. If the Ombudsman does not agree that the exclusion has been</p>	Yes	<p>Points 6.2, 8.3 and 8.8 of the Complaints Standard. Point 8.8 states: <i>“Where it is decided the complaint will not be escalated, the reasons why will be explained to the complainant fully both verbally and in writing, within ten working days. The</i></p>	

	fairly applied, the Ombudsman may tell the landlord to take on the complaint.		<i>communication will also outline the process of recourse to the relevant Ombudsman at this stage, should they wish to challenge the decision.”</i>	
2.5	Landlords must not take a blanket approach to excluding complaints; they must consider the individual circumstances of each complaint.	Yes	Careful consideration of each individual complaint is described in points 6.1 and 6.2 of the Complaints Standard	

Section 3: Accessibility and Awareness

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
3.1	Landlords must make it easy for residents to complain by providing different channels through which they can make a complaint. Landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of residents who may need to access the complaints process.	Yes	<p>Our methods of contact are listed in Section 16 of the Complaints Standard.</p> <p>Point 17.1 of the Complaints Standard states: <i>“The Housing Service will make this Standard available in a clear and accessible format for all residents and service users.”</i></p>	Methods of contact given are in person, over the telephone, in writing, by email and digitally.
3.2	Residents must be able to raise their complaints in any way and with any member of staff. All staff must be aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.	Yes	<p>Point 8.2 of the Complaints Standard states: <i>“Any complaint relating to Housing Services, howsoever received, must be logged with the Housing Reviews and Complaints Team immediately upon receipt.”</i></p>	The complaints officer meets with all Housing Services Management Teams on a regular basis to discuss complaints and processes.
3.3	High volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.	Yes	<p>Section 1.2 of the Complaints Standard states: <i>“We welcome and actively encourage residents, service users and elected members to engage with us when they are satisfied with the services they have received, want to make suggestions on</i></p>	

			<p><i>how we could improve, or when things have gone wrong. We believe that dealing effectively and transparently with all such feedback is essential to providing good services, by continuously learning, and improving what we do and how we do them.”</i></p> <p>Our methods of contact are clearly set out in section 16 of the Complaints Standard.</p>	
3.4	Landlords must make their complaint policy available in a clear and accessible format for all residents. This will detail the two stage process, what will happen at each stage, and the timeframes for responding. The policy must also be published on the landlord’s website.	Yes	Sections 8, 9 and 17 of the Complaints Standard	
3.5	The policy must explain how the landlord will publicise details of the complaints policy, including information about the Ombudsman and this Code.	Yes	Point 18.6 of the Complaints Standard states: <i>“This Standard will be reviewed annually, at the same time as the requirement for annual, self- assessment and at any time whereby there is a significant restructure and / or change in procedures. The outcomes must be reported to members, published on the website and in the annual report.”</i>	

3.6	Landlords must give residents the opportunity to have a representative deal with their complaint on their behalf, and to be represented or accompanied at any meeting with the landlord.	Yes	Point 5.1 of the Complaints Standard states: <i>“A complaint can also be raised by someone who has been directly affected by such a service, or who is representing a resident or service user, with the resident or service users' consent, including, but not limited to Elected Members.”</i>	
3.7	Landlords must provide residents with information on their right to access the Ombudsman service and how the individual can engage with the Ombudsman about their complaint.	Yes	Points 8.3 and 8.6 of the Complaints Standard. Point 8.3 states: <i>“The communication will also outline the process of recourse to the relevant Ombudsman at this stage, should the resident, service user or their representative wish to challenge the decision.”</i>	The resident is also informed of their right to access the Ombudsman Service in our complaint acknowledgement and response letters.

Section 4: Complaint Handling Staff

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
4.1	Landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). This Code will refer to that person or team as the 'complaints officer'. This role may be in addition to other duties.	Yes	An established Senior Review Officer (Complaints Officer) has the responsibility for complaint handling, liaison with the Ombudsman and reporting to the Corporate Management Team and the portfolio holder.	
4.2	The complaints officer must have access to staff at all levels to facilitate the prompt resolution of complaints. They must also have the authority and autonomy to act to resolve disputes promptly and fairly.	Yes	Point 8.13 of the Complaints Standard states that the complaint handler will always: <i>"have access to any staff at all levels to facilitate quick resolution and will have the authority and autonomy to act to resolve any dispute quickly and fairly."</i>	
4.3	Landlords are expected to prioritise complaint handling and a culture of learning from complaints. All relevant staff must be suitably trained in the importance of complaint handling. It is important that complaints are seen as a		Partially reflected in points 3.1 and 3.2 and section 18 of the Complaints Standard, this is more evidenced in our internal process.	Staff throughout the services are trained in recognising a complaint and channelling the complaint through to the Senior Review Officer.

	core service and must be resourced to handle complaints effectively			
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Section 5: The Complaint Handling Process

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
5.1	Landlords must have a single policy in place for dealing with complaints covered by this Code. Residents must not be treated differently if they complain.	Yes	We have a single Housing Services Complaint's & Enquiries Standard	
5.2	The early and local resolution of issues between landlords and residents is key to effective complaint handling. It is not appropriate to have extra named stages (such as 'stage 0' or 'informal complaint') as this causes unnecessary confusion.	Yes	Section 8.1 of the Complaints Standard states: <i>"Housing Services will apply a two stage complaints process."</i>	
5.3	A process with more than two stages is not acceptable under any circumstances as this will make the complaint process unduly long and delay access to the Ombudsman.	Yes	Section 8.1 of the Complaints Standard states: <i>"Housing Services will apply a two stage complaints process."</i>	
5.4	Where a landlord's complaint response is handled by a third party (e.g. a contractor or independent adjudicator) at any stage, it must form part of the two stage complaints process set out in this Code. Residents must not be	Yes	Our complaints are not handled by third parties.	

	expected to go through two complaints processes.			
5.5	Landlords are responsible for ensuring that any third parties handle complaints in line with the Code.	Yes	Our complaints are not handled by third parties.	
5.6	When a complaint is logged at Stage 1 or escalated to Stage 2, landlords must set out their understanding of the complaint and the outcomes the resident is seeking. The Code will refer to this as “the complaint definition”. If any aspect of the complaint is unclear, the resident must be asked for clarification.	Yes	<p>Point 8.2 of the Complaints Standard states: “All complaints and enquiries must be logged and acknowledged as a stage 1 complaint with five working days, after clarifying with the customer any issues which are unclear.”</p> <p>Point 8.7 states: “The Housing Reviews and Complaints Team will make reasonable efforts to understand why a customer remains unhappy as part of our Stage 2 response.”</p>	
5.7	When a complaint is acknowledged at either stage, landlords must be clear which aspects of the complaint they are, and are not, responsible for and clarify any areas where this is not clear.	Yes	<p>Point 8.2 of the Complaints Standard states: “All complaints and enquiries must be logged and acknowledged as a stage 1 complaint with five working days, after clarifying with the customer any issues which are unclear. The acknowledgement must set out the understanding of the outstanding issues and any</p>	

			<i>outcome/s the resident or service user is seeking.”</i>	
5.8	<p>At each stage of the complaints process, complaint handlers must:</p> <ul style="list-style-type: none"> a. deal with complaints on their merits, act independently, and have an open mind; b. give the resident a fair chance to set out their position; c. take measures to address any actual or perceived conflict of interest; and d. consider all relevant information and evidence carefully. 	Yes	This is reflected in Section 3 of the Complaints Standard, Our principles, and throughout point 8.13.	
5.9	<p>Where a response to a complaint will fall outside the timescales set out in this Code, the landlord must agree with the resident suitable intervals for keeping them informed about their complaint.</p>	Yes	Point 8.6 of the Complaints Standard states: <i>“If an extension of time is needed to produce a resolution / response then an explanation and a date for response must be agreed with the resident, service user or their representative. The extension of time should not exceed a further ten working days without good reason.”</i>	
5.10	<p>Landlords must make reasonable adjustments for residents where appropriate under the Equality Act 2010. Landlords must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities a</p>	Yes	Section 17.2 of the Complaints Standard. The complaints officer records and shares vulnerabilities with Service managers investigating.	

	resident has disclosed. Any agreed reasonable adjustments must be kept under active review.			
5.11	Landlords must not refuse to escalate a complaint through all stages of the complaints procedure unless it has valid reasons to do so. Landlords must clearly set out these reasons, and they must comply with the provisions set out in section 2 of this Code.	Yes	Explained in point 8.7 of the Complaints Standard	
5.12	A full record must be kept of the complaint, and the outcomes at each stage. This must include the original complaint and the date received, all correspondence with the resident, correspondence with other parties, and any relevant supporting documentation such as reports or surveys.	Yes	A full record, as described, is held within the CX Housing Management System and SharePoint.	
5.13	Landlords must have processes in place to ensure a complaint can be remedied at any stage of its complaints process. Landlords must ensure appropriate remedies can be provided at any stage of the complaints process without the need for escalation.	Yes	Point 10.1 states: <i>“Appropriate remedies can be provided at any stage of the complaints process without the need for escalation.”</i>	
5.14	Landlords must have policies and procedures in place for managing unacceptable behaviour from residents and/or their representatives. Landlords	Yes	This is set out very clearly in section 15 of the Complaints Standard.	

	must be able to evidence reasons for putting any restrictions in place and must keep restrictions under regular review.			
5.15	Any restrictions placed on contact due to unacceptable behaviour must be proportionate and demonstrate regard for the provisions of the Equality Act 2010.	Yes	Point 17.2 of the Complaints Standard states: <i>“The Housing Service will comply with the Equality Act 2010 and may adapt normal policies, procedures, or processes to accommodate an individual’s needs in line with the Act and ensure that relevant officers are appropriately trained to deal with such requests.”</i>	

Section 6: Complaints Stages

Stage 1

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.1	Landlords must have processes in place to consider which complaints can be responded to as early as possible, and which require further investigation. Landlords must consider factors such as the complexity of the complaint and whether the resident is vulnerable or at risk. Most stage 1 complaints can be resolved promptly, and an explanation, apology or resolution provided to the resident.	Yes	Section 10 of the Complaints Standard. Point 10.1 states: <i>“Complaints can be resolved in several ways. We intend that any remedy offered reflects the extent of all service failures, and the level of detriment caused to the resident as a result. Appropriate remedies can be provided at any stage of the complaints process without the need for escalation.”</i>	
6.2	Complaints must be acknowledged, defined and logged at stage 1 of the complaints procedure <u>within five working days of the complaint being received.</u>	Yes	Point 8.2 of the Complaints Standard states: <i>“Any complaint relating to Housing Services, howsoever received, must be logged with the Housing Reviews and Complaints Team immediately upon receipt. All complaints and enquiries must be logged and acknowledged as a stage 1 complaint with five working days, after clarifying with the customer any issues which are unclear.”</i> and Section 9 of	

			the Complaints Standard gives the timescale: <i>“Logging and acknowledgement (All) Five working days”</i>	
6.3	Landlords must issue a full response to stage 1 complaints <u>within 10 working days</u> of the complaint being acknowledged.	Yes	Section 9 of the Complaints Standard gives the timescale: <i>“Stage 1 response (Complaint accepted) Ten working days from receipt of complaint”</i>	
6.4	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 10 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Point 8.6 of the Complaints standard states: <i>“If an extension of time is needed to produce a resolution / response then an explanation and a date for response must be agreed with the resident, service user or their representative. The extension of time should not exceed a further ten working days without good reason.”</i> And the timescale is also given in section 9 of the Complaints Standard	
6.5	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Point 8.6 of the Complaints Standard states: <i>“Where an extension period cannot be agreed, then the complainant will be provided with the relevant Ombudsman details, should they wish to challenge the Council on the standards.”</i>	

6.6	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Point 8.10 of the Complaints Standard states: <i>“All complaint responses must be sent to the resident, service user or their representative when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed.”</i>	
6.7	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Point 8.13 of the Complaints Standard includes: <i>“Address all points in the complaint, provide clear responses and reasons for decisions, referencing any relevant law, policy or best practice applied in reaching the decision.”</i>	
6.8	Where residents raise additional complaints during the investigation, these must be incorporated into the stage 1 response if they are related and the stage 1 response has not been issued. Where the stage 1 response has been issued, the new issues are unrelated to the issues already being investigated or it would unreasonably delay the response, the new issues must be logged as a new complaint.	Yes	Point 8.11 of the Complaints Standard states: <i>“Consider incorporating additional complaints made during any investigation period if they are relevant and if the response has yet to be issued. Where the response has been issued, or investigation would unreasonably delay the response, then a new complaint should be opened.”</i>	
6.9	Landlords must confirm the following in writing to the resident at the completion of stage 1 in clear, plain language:	Yes	We use a template resolution letter at Stage 1 that includes all the points listed.	

	<ul style="list-style-type: none"> a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to stage 2 if the individual is not satisfied with the response. 			
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Stage 2

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
6.10	If all or part of the complaint is not resolved to the resident's satisfaction at stage 1, it must be progressed to stage 2 of the landlord's procedure. Stage 2 is the landlord's final response.	Yes	Point 8.7 of the Complaints Standard states: <i>"If the resident, service user or their representative remains dissatisfied with any outcome, the complaint will be progressed to Stage 2."</i>	
6.11	Requests for stage 2 must be acknowledged, defined and logged at stage 2 of the complaints procedure within five working days of the escalation request being received.	Yes	Point 8.9 of the Complaints Standard states: <i>"Where an escalation has been accepted, then Stage 2 will be acknowledged within five working days"</i>	
6.12	Residents must not be required to explain their reasons for requesting a	Yes	Point 8.7 of the Complaints Policy states: <i>"Customers are</i>	

	stage 2 consideration. Landlords are expected to make reasonable efforts to understand why a resident remains unhappy as part of its stage 2 response.		<i>not required to explain their reasons for requesting a Stage 2 consideration. The Housing Reviews and Complaints Team will make reasonable efforts to understand why a customer remains unhappy as part of our Stage 2 response.”</i>	
6.13	The person considering the complaint at stage 2 must not be the same person that considered the complaint at stage 1.	Yes	Point 8.7 of the Complaints Standard states: <i>“A tier four Manager, or Assistant Director, in their absence, will then review the stage 1 process and in discussion with the complainant, decide if there are grounds to escalate the complaint to Stage 2.”</i>	Tier 4 managers will only be expected in exceptional circumstances to respond to Stage 1 complaints and so will not be the same person that considered the complaint at stage 1.
6.14	Landlords must issue a final response to the stage 2 <u>within 20 working days</u> of the complaint being acknowledged.	Yes	Point 8.9 of the Complaints Standard states: <i>“A formal written response will be provided to the complainant within twenty working days”. The timescale is also given in Section 9.</i>	
6.15	Landlords must decide whether an extension to this timescale is needed when considering the complexity of the complaint and then inform the resident of the expected timescale for response. Any extension must be no more than 20 working days without good reason, and the reason(s) must be clearly explained to the resident.	Yes	Point 8.6 of the Complaints Standard states: <i>“If an extension of time is needed to produce a resolution / response then an explanation and a date for response must be agreed with the resident, service user or their representative. The extension of time should not</i>	

			<i>exceed a further ten working days without good reason.”</i>	
6.16	When an organisation informs a resident about an extension to these timescales, they must be provided with the contact details of the Ombudsman.	Yes	Point 8.6 of the Complaints Standard states: <i>“Where an extension period cannot be agreed, then the complainant will be provided with the relevant Ombudsman details, should they wish to challenge the Council on the standards.”</i>	
6.17	A complaint response must be provided to the resident when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned promptly with appropriate updates provided to the resident.	Yes	Point 8.10 of the Complaints Standard states: <i>“All complaint responses must be sent to the resident, service user or their representative when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned expeditiously, with regular updates provided to the resident, service user or their representative.”</i>	
6.18	Landlords must address all points raised in the complaint definition and provide clear reasons for any decisions, referencing the relevant policy, law and good practice where appropriate.	Yes	Point 8.13 of the Complaints Standard states: <i>“Address all points in the complaint, provide clear responses and reasons for decisions, referencing any relevant law, policy or best practice applied in reaching the decision.”</i>	

6.19	Landlords must confirm the following in writing to the resident at the completion of stage 2 in clear, plain language: a. the complaint stage; b. the complaint definition; c. the decision on the complaint; d. the reasons for any decisions made; e. the details of any remedy offered to put things right; f. details of any outstanding actions; and g. details of how to escalate the matter to the Ombudsman Service if the individual remains dissatisfied.	Yes	We use a template resolution letter at Stage 2 that includes all the points listed.	
6.20	Stage 2 is the landlord's final response and must involve all suitable staff members needed to issue such a response.	Yes	Point 8.9 of the Complaints Standard states: <i>"Give any complainant, Officer or Contractor who is subject to the complaint, a chance to set out their position and comment on any adverse findings before a final decision is made."</i>	

Section 7: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
7.1	Where something has gone wrong a landlord must acknowledge this and set	Yes	Point 10.1 of the Complaints Standard states: <i>"Where</i>	

	<p>out the actions it has already taken, or intends to take, to put things right. These can include:</p> <ul style="list-style-type: none"> • Apologising; • Acknowledging where things have gone wrong; • Providing an explanation, assistance or reasons; • Taking action if there has been delay; • Reconsidering or changing a decision; • Amending a record or adding a correction or addendum; • Providing a financial remedy; • Changing policies, procedures or practices. 		<p><i>something has been found to have gone wrong, we will acknowledge this and clearly set out the actions already taken, or intended to be taken to put things right, and by when.</i></p> <p>Point 10.2 lists remedies.</p>	
7.2	<p>Any remedy offered must reflect the impact on the resident as a result of any fault identified.</p>	Yes	<p>Point 10.1 of the Complaints Standard states: <i>“We intend that any remedy offered reflects the extent of all service failures, and the level of detriment caused to the resident as a result.”</i></p>	
7.3	<p>The remedy offer must clearly set out what will happen and by when, in agreement with the resident where appropriate. Any remedy proposed must be followed through to completion.</p>	Yes	<p>Point 10.1 of the Complaints Standard states: <i>“Where something has been found to have gone wrong, we will acknowledge this and clearly set out the actions already taken, or</i></p>	

			<i>intended to be taken to put things right, and by when.”</i>	
7.4	Landlords must take account of the guidance issued by the Ombudsman when deciding on appropriate remedies.	Yes	Remedies are described in Section 10 of the Complaints Standard , and these have been aligned with the Ombudsman’s Complaint Handling Code.	

Section 8: Putting things right

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
8.1	<p>Landlords must produce an annual complaints performance and service improvement report for scrutiny and challenge, which must include:</p> <ul style="list-style-type: none"> a. the annual self-assessment against this Code to ensure their complaint handling policy remains in line with its requirements. b. a qualitative and quantitative analysis of the landlord’s complaint handling performance. This must also include a summary of the types of complaints the landlord has refused to accept; c. any findings of non-compliance with this Code by the Ombudsman; d. the service improvements made as a result of the learning from complaints; e. any annual report about the landlord’s performance from the Ombudsman; and f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord. 	Yes	We produce an Annual Report which includes the list as identified in 8.1	

8.2	The annual complaints performance and service improvement report must be reported to the landlord's governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body's response to the report must be published alongside this.	Yes	The Annual Report and Self-Assessment are considered by the Council's Corporate Management Team and their response is published alongside these.	
8.3	Landlords must also carry out a self-assessment following a significant restructure, merger and/or change in procedures.	n/a	There has been no merger or restructure however it is in our standard, point 18.6 should one occur.	
8.4	Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.	n/a	We have not been asked to review and update the self-assessment following an Ombudsman investigation.	
8.5	If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.	n/a	We are currently complying with the code.	

Section 9: Scrutiny & oversight: continuous learning and improvement

Code provision	Code requirement	Comply: Yes / No	Evidence	Commentary / explanation
9.1	Landlords must look beyond the circumstances of the individual complaint and consider whether service improvements can be made as a result of any learning from the complaint.	Yes	Point 10.2 of the Complaints Standard includes a remedy: <i>“Changing Policies, Procedures and working practices, with inclusion of a resident panel and within the confines of legislation and regulation.”</i>	
9.2	A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.	Yes	Point 1.2 of the Complaints Standard states: <i>“We welcome and actively encourage residents, service users and elected members to engage with us when they are satisfied with the services they have received, want to make suggestions on how we could improve, or when things have gone wrong. We believe that dealing effectively and transparently with all such feedback is essential to providing good services, by continuously learning, and improving what we do and how we do them.”</i>	
9.3	Accountability and transparency are also integral to a positive complaint handling culture. Landlords must report back on wider learning and	Yes	Points 1.2 of the Complaints Standard as above. Point 18.4 of the Complaints Standard states: <i>“Housing Services will</i>	

	improvements from complaints to stakeholders, such as residents' panels, staff and relevant committees.		<i>report back on wider learning and improvements resulting from complaints in the annual report, more regularly through service wide web pages to residents, service users and elected members."</i>	
9.4	Landlords must appoint a suitably senior lead person as accountable for their complaint handling. This person must assess any themes or trends to identify potential systemic issues, serious risks, or policies and procedures that require revision.	Yes	At Stage 1 we have a Housing Complaints Team with a Senior Review Officer, and Stage 2 we have the Heads of Service, who carry out analysis and make recommendations.	
9.5	In addition to this a member of the governing body (or equivalent) must be appointed to have lead responsibility for complaints to support a positive complaint handling culture. This person is referred to as the Member Responsible for Complaints ('the MRC').	Yes	Cllr Bill Hartnett, Portfolio Holder for Housing, is our MRC.	
9.6	The MRC will be responsible for ensuring the governing body receives regular information on complaints that provides insight on the landlord's complaint handling performance. This person must have access to suitable information and staff to perform this role and report on their findings.	Yes	Quarterly Portfolio Holder Meetings are held with our MRC.	

9.7	<p>As a minimum, the MRC and the governing body (or equivalent) must receive:</p> <ul style="list-style-type: none"> a. regular updates on the volume, categories and outcomes of complaints, alongside complaint handling performance; b. regular reviews of issues and trends arising from complaint handling; c. regular updates on the outcomes of the Ombudsman’s investigations and progress made in complying with orders related to severe maladministration findings; and d. annual complaints performance and service improvement report. 	Yes	<p>Quarterly Portfolio Holder Meetings and referred to within Point 18.3 of the Complaints Standard which states: <i>“Complaint and enquiry reports for Housing Services will be shared and reviewed with the Housing Service Management Team at least quarterly and Corporate Leadership Team, with the intention of taking collective responsibility for shortfalls identified through complaints and to maintain professional standards in dealing with complaints.”</i> <i>The self assessment and annual performance report will be presented to the Council’s Executive Committee for approval annually.</i></p>	
9.8	<p>Landlords must have a standard objective in relation to complaint handling for all relevant employees or third parties that reflects the need to:</p> <ul style="list-style-type: none"> a. have a collaborative and co-operative approach towards resolving complaints, working with colleagues across teams and departments; b. take collective responsibility for any shortfalls identified through 	Yes	<p>Complaints and Enquiries Standard – Referred to in Section 3, Our Principles</p>	

	complaints, rather than blaming others; and c. act within the professional standards for engaging with complaints as set by any relevant professional body.			
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Housing Services

2024-25 Annual Complaints Performance and Service Improvement Report

Contents:

1. Overview and context:
2. 2024/25 Annual Self-assessment
3. Tenancy Satisfaction Measures (TSMs)
4. Analysis of our complaint handling performance 2024-2025
5. Stage 1 complaints
6. Stage 2 Complaints
7. Learning from Complaints
8. Ombudsman: Landlord Performance Reports and Interventions
9. Recommendations

1. Overview and context:

- 1.1 Since 2020, The Housing Ombudsman Service, among other landlord regulation, has prescribed requirements for the Councils Housing Service to ensure we respond effectively and fairly to complaints. These are defined in Housing Ombudsman Complaint Handling Code. The purpose of the Code is to enable landlords to resolve complaints raised by residents quickly and use the data and learning from complaints to drive service improvements.
- 1.2 The Complaint Handling Code aims to achieve best practice in complaint handling and ultimately to provide a better service to residents and drive a positive complaint handling culture.
- 1.3 From 1 April 2024, the Code became statutory meaning that member landlords are required by law to follow its requirements.
- 1.4 The Housing Service must also report on performance, using accurate data, to drive learning and continuous service improvements, that improve landlord and tenant relations.
- 1.5 If the Ombudsman decides that the housing service has not handled a complaint in accordance with the code, and our procedure, then the service risks the issue of a Complaint Handling Failure Order (CHFO) for maladministration, and the Ombudsman will order the Service to put things right and ensure compliance with the code. The Ombudsman publishes a report on CHFOs quarterly, and the Housing Service will be inspected by the Regulator every four years.

2. 2024/25 Annual Self-assessment

- 2.1 We are required to publish the mandatory self-assessment of our Housing Complaints Policy against the Housing Ombudsman's Complaint Handling Code to ensure that it remains in line with their requirements. This is a positive experience and ensures the Council is meeting its statutory requirements and provides quality services to our tenants.

The Self-assessment - Complaint Handling Code 2025 - Housing Ombudsman and Housing Services Complaints & Enquires Standard 2022 will be available and can be found at: <https://www.redditchbc.gov.uk/residents/my-home/housing-complaint-or-enquiry/i-am-a-council-tenant>

- 2.2 Complaint performance is presented to the Portfolio Holder for Housing quarterly to enable regular oversight for members on our performance and identified learnings.
- 2.3 The below summarises our submission showing we that we are fully complaint with the Complaint Handling Code, following the observations and changes identified that were made.

- **Section 1: Definition of a complaint**

We are fully compliant with this section which refers to recognising and defining a complaint.

- **Section 2: Exclusions**

We are fully compliant with this section which is regarding the decisions to not accept a complaint.

- **Section 3: Accessibility and Awareness**

We are fully compliant with this section, which reminds us that high volumes of complaints must not be seen as a negative, as they can be indicative of a well-publicised and accessible complaints process. Low complaint volumes are potentially a sign that residents are unable to complain.

- **Section 4: Complaint Handling Staff**

We are fully compliant with this section. We have a dedicated, suitably experienced, and qualified Complaints Officer that oversees the complaint handling process and all officers operating within it.

The Complaints Service is part of the Housing Database & Performance Team which sits within the Strategic Housing Service to provide greater independence in managing and reporting of the complaints process.

- **Section 5: The Complaint Handling Process**

We are fully compliant with this section, where the Complaint Handling Code stipulates that the complaint process is a clear two-stage formal process, there is no informal stage.

- **Section 6: Complaints Stages**

We are fully compliant in our illustration of the two-stage complaint process.

- **Stage 2 complaints**

We are fully compliant with this section in which the Ombudsman has stipulated that residents must not be required to explain their reasons for requesting a stage 2 consideration. However, we recognised that there have been occasions where we have made the decision to not accept an escalation, for the wrong reasons. The Complaints Standard has therefore been updated with the following paragraph:

If we have accepted the complaint and responded at Stage 1, we would only refuse to escalate the complaint to Stage 2 for either of the following reasons:

- *If the complaint should not be looked at further because it could compromise legal proceedings to do so.*
- *If it has now become clear that this complaint has previously exhausted the complaints process.*

- **Section 8: Putting things right**

We are fully compliant with this section which was regarding redress and the production of the Annual Complaints Performance and Service Improvement Report for scrutiny and challenge.

We deemed that the following points remained not applicable again this year as we had not had any instances:

- a. Landlords may be asked to review and update the self-assessment following an Ombudsman investigation.
- b. If a landlord is unable to comply with the Code due to exceptional circumstances, such as a cyber incident, they must inform the Ombudsman, provide information to residents who may be affected, and publish this on their website Landlords must provide a timescale for returning to compliance with the Code.

3. Tenancy Satisfaction Measures (TSMs)

- 3.1 The Tenant Satisfaction Measures Standard requires all registered providers to generate and report tenant satisfaction measures (TSMs) as specified by the regulator. The central aims of the TSMs are to provide tenants with greater transparency about their landlord's performance and inform the regulator about how a landlord is complying with consumer standards.
- 3.2 We were required to provide TSMs generated from management information for housing complaints data for the full period 1st April 2024 to 31st March 2025. For this purpose, I used the quantitative data from the Housing Complaints Tracker, as the data on the Corporate System is not reliable.

This produced the following:

TSM measure CH01 Complaints relative to the size of the landlord (based on housing stock of 5541) as follows:

- 1) **22.37** Stage 1 complaints per 1000 homes (2023/24: 22)
- 2) **3.79** Stage 2 complaints per 1000 homes (2023/34: 1.21)

TSM measure CH02 Complaints responded to within Complaint Handling Code timescales as follows:

- 1) **62%** Stage 1 responses responded within the Housing Ombudsman's Complaint Handling Code timescale. (2023/24: 58.2%)
- 2) **80%** Stage 2 responses responded to within the Housing Ombudsman's Complaint Handling Code timescale. (2023/24: 57.14)

4. Analysis of our complaint handling performance 2024-2025

- 4.1 The Housing Ombudsman code states that landlords must have a person or team assigned to take responsibility for complaint handling, including liaison with the Ombudsman and ensuring complaints are reported to the governing body (or equivalent). Their Complaint Handling Code refers to that person or team as the ‘complaints officer.’
- 4.2 We currently have a Senior Complaints Officer who administers all housing complaints, responsible for ensuring timely contact with the customer to acknowledge and respond to the complaint, requesting and tracking the investigation, and monitoring and reporting on complaint types, outcomes and learnings, themes and trends, and these are delivered at monthly Housing Services Meetings. As part of a service review two additional complaint handling officers are to be appointed.
- 4.3 For the purposes of this Annual Report we have provided detailed data and analysis from the 1st April 2024 to 31st March 2025.

5. Stage 1 complaints

- 5.1 The following tables provide qualitative statistics around quantity and types of Stage 1 complaints received, numbers closed and upheld, and the percentage responded within the timescale set out by the Housing Ombudsman’s Complaint Handling Code:

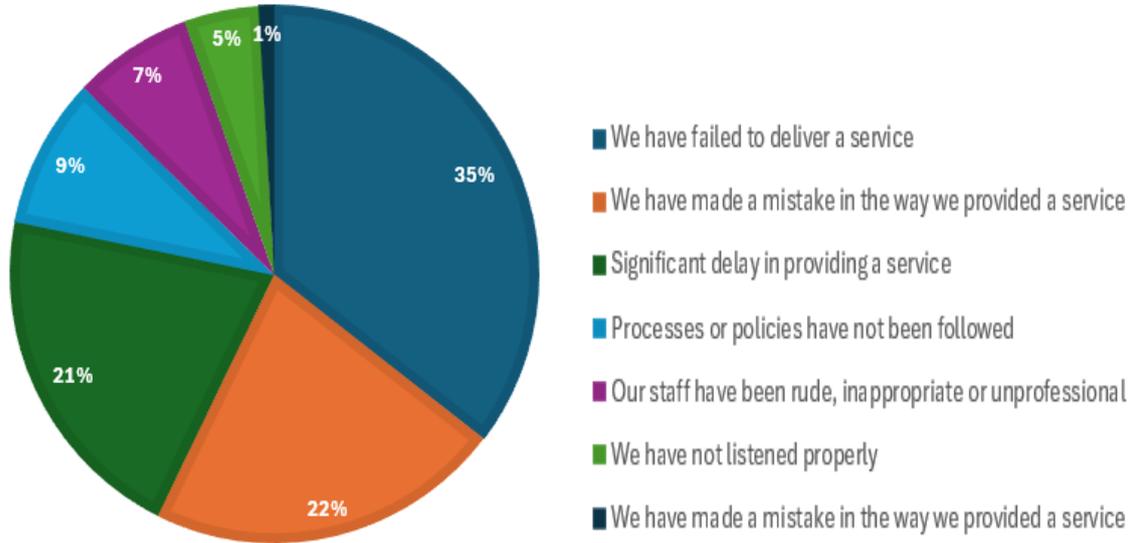
Complaints	Housing Services			Housing Property Services			Total
	N&T	V&A	Revenue	A&A	R&M	Capital	
Stage 1 Received	21	1	4	3	71	19	124
Stage 1 Closed	23	2	5	3	74	17	127
Stage 1 upheld/partially upheld	5	1	2	2	39	7	56
Stage 2 received	6	0	1	0	11	3	21
Ombudsman received	2	0	0	0	7	1	10

N&T = Neighbourhood & Tenancy
V&A = Voids & Allocations

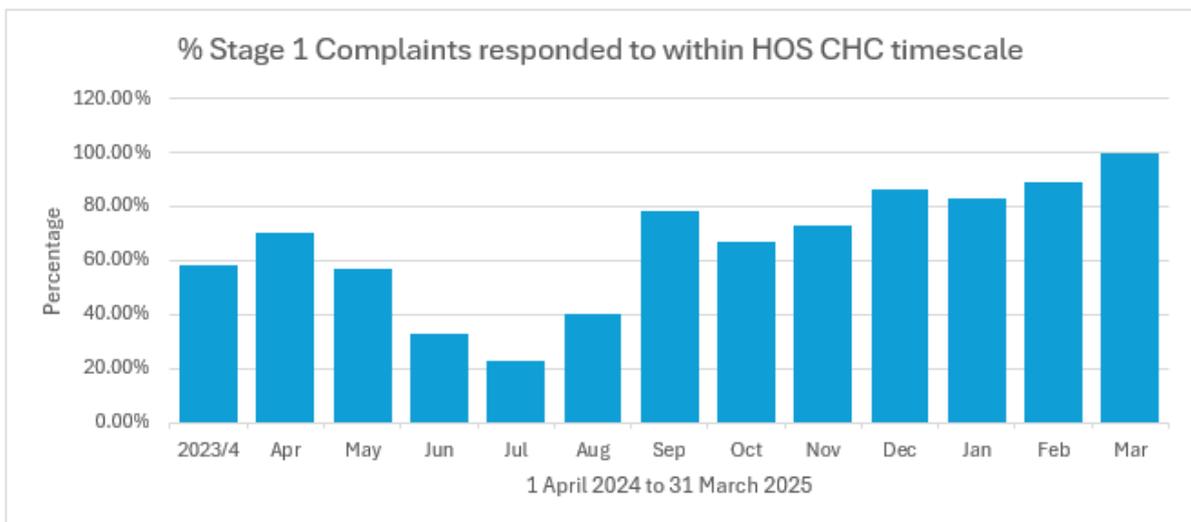
A&A = Aids & Adaptations
R&M = Repairs & Maintenance

5.2 The following chart shows that the most common reason for making a complaint is where we have failed to deliver a service, for which there were 47, 35 of these being for Repairs & Maintenance.

Complaint Types:



5.3 The graph below shows the percentage of complaints responded to within the Housing Ombudsman code requirements including the years figure for 2023/24 for comparison. Due to the declining performance in the first quarter a dedicated complaints investigator was introduced in Housing Property Services from August 2025 to improve complaints handling performance.



- 5.6 We received 11 complaints but not accepted for the following reasons:
- 3 were found to be service requests, whereby the complaint was not about the service but about an issue that was being raised for the first time.
 - 8 were withdrawn by the complainant
- 5.7 A total of 55 complaints needed to be extended to the 20 working days acceptable timescale. 25 complaints breached the 20-day timescale, equating to 19.7% of all complaints received. 19 of the 25 complaints that were not responded within the timeframes were for Housing Property Services (HPS) who were affected early on due to closing end of year accounts, setting up new contracts and a major recruitment drive. This then caused a backlog of complaints and enquiries. The introduction of a dedicated complaints investigator resulted in the average number of complaints responded to within 10 working days to improve from 41% for the first half of the year to 76% for the second half.
- 5.8 Compensation was paid to complainants in 9 Stage 1 complaints totalling £1795.21.

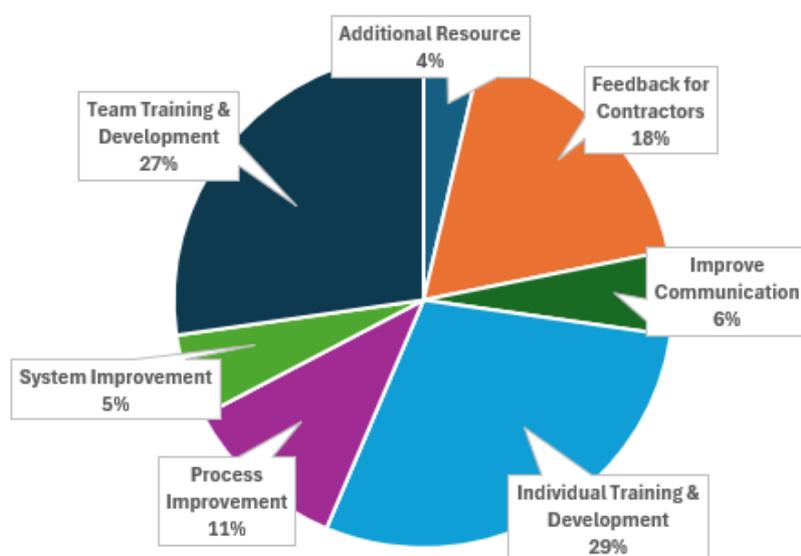
6. Stage 2 Complaints

- 6.1 A total of 21 complaints were escalated to Stage 2 and 15 of them were accepted as formal Stage 2 complaints, 3 for Neighbourhood & Tenancy, 2 for Housing Capital, 1 for Revenues and 9 for Repairs & Maintenance. Of these, 1 of the Stage 2 complaints resulted in a further/different outcome:
- 6.2 Following the Stage 1 response, a tenant remained unhappy about delays in conducting work to her loft, non-response to telephone call backs requested and Health and Safety concerns from Council Officers through the delivery of insulation works. The stage 2 complaint provided the Council with an opportunity to gain experience from this. Firstly, to ensure we send the correct officers to complete the works required, that we communicate more effectively in person and also via telephone. Finally, we advised that we would review the Health and Safety concerns and if there are actions resulting from this, we would implement them in due course. We offered her a goodwill payment of £50 due to the impact on service delivery and delays in responses, and a further £50 due to upset caused.

7. Learning from Complaints

- 7.1 The Housing Ombudsman's Complaint Handling Code stipulates that we must look beyond the circumstances of an individual complaint and consider whether service improvements can be made because of any learning from the complaint. A positive complaint handling culture is integral to the effectiveness with which landlords resolve disputes. Landlords must use complaints as a source of intelligence to identify issues and introduce positive changes in service delivery.

- 7.2 This year has been focused on not only capturing the learning and understanding trends but also seeking assurance that steps have been taken to address the learning. This should not only seek to eliminate further complaints about a same occurrence but can be utilised during training and development of new staff and demonstrates continuous service improvement.
- 7.3 Between 1st April 2024 and 31st March 2025, 55 learning outcomes were recorded as a result of complaints that were fully and partially upheld, the learning types and number presented as follows:



- 7.4 **Process Improvement for Capital:** In the past, RBC conducted EICRs on a ten-year rolling program. We changed our policy around four years ago and now conduct these reports on a five year turn around. A complaint was made that revealed that this change had caused some to fall outside of this five-year target. Housing Capital have asked for a review of all (EICR) data to be undertaken to ensure that the electrical installations undergo periodic inspection and testing, and that works are issued to contractors in a timely manner to allow continuity and compliance.
- 7.5 **System Improvement for R&M:** A complaint had been received regarding a delay in addressing a leak to a water tank leaving a tenant without heating and hot water. We were able to advise the tenant that the council are investing in a new and more comprehensive asset management and repairs system which is based around providing better customer engagement and also management of components like the central heating systems.
- 7.6 **Feedback for Contractors:** A complaint had been received regarding the fitting of a light, poor workmanship and delays. We recognised that Citrus should have spoken to RBC, prior to commencing the repair, to find out the previous job's history, which would have enabled him to stock up on the appropriate fittings needed to carry out the job. This would have ensured there

was a smooth and seamless process in place and saved any further delays in carrying the works out. We recognise that a better communication process needs to be put in place by Citrus, for example a spreadsheet to be implemented, to include previous jobs and appointments. Citrus have agreed to this, which will include previous works history and updated new appointment times to share with RBC to stop delays in any work.

- 7.7 **Training and Development for R&M:** There were a large number of complaints upheld for R&M highlighting that communication had been poor with loss of paperwork and admin errors which caused delays in getting repair requests completed. R&M have had a lot of temporary staff working within the department within the last two years and have had a huge turnover of staff. Moving forward, all temporary staff are put through a thorough an improved induction training programme to make sure they are fully trained on IT repair software and working practice and policy, to enable us to provide a seamless service.

8. Ombudsman: Landlord Performance Reports and Interventions

- 8.1 Individual landlord performance reports are published for landlords with 5 or more cases determined within a full financial year. They have now published the Landlord Performance Report for Redditch Borough Council for 2023-24, where they determined that we performed well when compared to similar landlords by size and type regarding maladministration.
- 8.2 Between 1st April 2024 and 31st March 2025 we received 3 determinations where the Housing Ombudsman fully or partially upheld a complaint following intervention:

- **28th May 2024:**

The Housing Ombudsman upheld a complex complaint finding maladministration in response to the resident's reports of mould and damp, reports of an unidentified ticking noise, non-damp and mould repairs and complaint handling. The Housing Service were ordered to pay the resident £3114.95 for our failures. All relevant staff completed the learning modules on the Ombudsman's Landlord Learning Hub for noise complaints, Knowledge and Information Management (KIM) and attitudes, respect and rights and attended Supporting Vulnerable Tenants Training

- **30th July 2024:**

The Housing Ombudsman made a determination regarding a longstanding complaint with events dating back to 2015. They found maladministration in our handling of the resident's concerns of staff conduct and his reports of discrimination, maladministration in our handling of the resident's reports of bacteria in his previous property affecting his health, including his transfer application based on medical needs and maladministration in our complaint handling and record keeping. We found ourselves out of time to appeal and therefore had to accept the determinations. Compensation of £1600 was

ordered, and we were able to reflect on the significant improvements to complaint handling over the last 12 months, a new Integrated Housing Management System that we continue to improve and develop, a new Housing Allocations System and digitalisation of historic paper files for improved record keeping. Together with the free e-learning complaint handling courses that are available on the Housing Ombudsman's Learning Hub, we also explored additional further enhanced training opportunities through the Housing Quality Network for key members of staff.

- **4th December 2024**

The Housing Ombudsman made a further determination for the same resident as above, finding maladministration in response to reports of assault against the resident, complaint handling and record keeping. We were unsuccessful in our appeal and were ordered to pay the resident £1100 in compensation and we assured the Ombudsman that further training has taken place with all staff members to ensure that appropriate processes and reporting take place in the future.

9. Recommendations

9.1 Housing Services Complaints & Enquiries Standard updated, to be approved.



Housing Services Complaints Standard 2025

Document Version Control

Created By	Helen Oakes – Housing, Tenancy & Advisory Manager			
Date Approved				
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Version Number	Modified By	Modifications Made	Date Modified	Status
V1	Helen Oakes	Draft	17/06/2021	Draft
V2		Additions	18/06/2021	Draft
V3	Jon Elger	Track changes & additions	22/06/2021	Draft
V4	Helen Oakes	Review track changes	22/06/2021	Draft
V5	Helen Oakes	Modification – tenant panel	14/07/2021	Draft
V6	Helen Oakes	Modification – removal of tenant panel & finalise for CMT	23/07/2021	Draft
V7	Helen Oakes	Amendment to include comments and compliments further to CMT approval	28/07/2021	Final
V8	Helen Oakes	Review and revision as required by Regulator	08/11/2022	Revision
V9	Jo Frost	Review and revision as required by Regulator	27/06/2024	Revision
V10	Jo Frost	Review and revision as required by Regulator	14/04/2025	Revision

1. Introduction

- 1.1 Redditch Borough Council Housing Services wants to make sure our residents and service users are satisfied with the services they receive.
- 1.2 We welcome and actively encourage residents, service users and elected members to engage with us when they are satisfied with the services they have received, want to make suggestions on how we could improve, or when things have gone wrong. We believe that dealing effectively and transparently with all such feedback is essential to providing good services, by continuously learning, and improving what we do and how we do them.
- 1.3 This standard applies only to tenants, residents and users of housing services, and their representatives, and clearly sets out how complaints and feedback will be consistently dealt with, ensuring that residents and service users voices are heard and wherever possible and meaningfully engaged when changes or improvements are identified as required to our approach and processes.

2. Aims and Objectives

- 2.1 That the Housing Service:
 - Affords clarity and consistency to residents, service users and members.
 - Manages complaints and feedback, and in accordance with legislation, obligations, and consolidated best practice.
 - Empowers staff to take responsibility and handle customer complaints effectively and minimise failure demand.
 - Captures feedback and uses it to understand our residents and service users and as insight, to drive continuous service improvement.
 - Makes best use of resources and delivers value for money to residents and service users.

3. Our Principles

- 3.1 Housing Services take all feedback and comments seriously and we encourage all colleagues to resolve issues by meaningfully engaging with our residents, service users and their representatives personally wherever possible, and to take a collaborative and co-operative approach to resolving complaints, working with colleagues across teams and departments where necessary.
- 3.2 We will:
 - Put the resident, service user or their representative at the heart of the process, engaging and handling any complaint with sensitivity, dignity and respect and endeavoring to both understand and respond clearly and appropriately to the circumstances.
 - Keep members, residents and service users informed about the complaint's progress; do what we say we will, when we say we will do it and provide an outcome within agreed timeframes.
 - Apologise and offer suitable redress if we have made a mistake, or when something has gone wrong, we will put it right as soon as possible.

- Make sure our response addresses all elements of the complaint and provides explanations for any decisions made or actions taken.
- Record all complaint information and use it in a positive way to prevent similar occurrences in the future to ensure that we can learn and improve.

4. What is a complaint?

- 4.1 A **complaint** is any expression of dissatisfaction, however made, about the standard of service, actions, or lack of action, by the Housing Service, its own staff, or those acting on its behalf (such as a partner or contractor), affecting an individual resident or group of residents and that requires a response.
- 4.2 A complaint could be in relation to any of the following:
- There has been a significant delay in providing a service.
 - We have made a mistake in the way we provided a service.
 - We have failed to deliver a service: this could relate to the quality, standard or service level.
 - We have not listened properly.
 - Our processes or policies have not been followed.
 - Our legal or regulatory obligations have not been met.
 - We have not delivered against a commitment or promise.
 - Our staff have been rude, inappropriate, or unprofessional.
- 4.3 The word “complaint” does not have to be explicitly used for it to be treated as such. The Housing Reviews and Complaints Team will make initial contact with the resident or service user and clarify with them if they wish for it to be a complaint to be handled in line with the Complaints Standard, or if it is a **service request**, whereby a resident or service user is unhappy with a situation that they wish to have rectified, and co-ordinate accordingly.
- 4.4 If further enquiries are needed to resolve the matter, or if the resident requests it, the issue must always be logged as a complaint.

5. Who can complain?

- 5.1 A resident or service user who has received a service provided by, or on behalf of the Housing Service, can raise a complaint. A complaint can also be raised by someone who has been directly affected by such a service, or who is representing a resident or service user, with the resident or service users' consent, including, but not limited to Elected Members. (*1)

6. What is not considered a complaint?

- 6.1 Where a resident or service user has expressed their dissatisfaction with the Housing Service, but it is not appropriate to follow this Standard or the Corporate Complaints Policy, the resident or service user will be advised of this at the earliest possible opportunity and given information about any alternative

procedure. Such occasions are:

- Survey feedback and requests for service need not be treated as complaints, however, where possible, the Council will make the respondent aware of how they can pursue their dissatisfaction as a complaint if they wish to.
- Appeals processes against a decision made - for some services there are alternative statutory appeals, tribunal processes or other policies in place which must be used rather than this Standard or the Corporate Complaints Policy. For example, the Landlord's decision to end an Introductory Tenancy.
- Where dissatisfaction with a decision or judgment is expressed in the absence of any fault or failure on the part of the Housing Service, such as those listed in section 4.
- Complaints about Councillors and Members of Parliament (MP's)
- Complaints made more than one year after the resident or service user became aware of the issue (unless there are exceptional circumstances), due to the passage of time.
- Staff personnel issues, such as discipline, grievance, recruitment, and selection.
- Allegations of fraud, theft, or corruption by a member of staff.

6.2 If the Council decides not to accept a complaint, a detailed explanation must be provided to the complainant or their representative, setting out the reasons why the matter is not suitable for the complaints processes and the right and process then to take the matter to the Ombudsman.

(*1) If the resident or service user is complaining or enquiring through a councillor or MP then consent is implied, however regard MUST be given to releasing information pertaining to third parties to any response to any enquiry or complaint, for example another resident or service user.

7. How we will handle complaints from elected members

7.1 Members are representatives of residents and service users; therefore, the complaint must be logged with the Housing Reviews and Complaints Team, and treated in the same way as a complaint, and in accordance with section 8 & 9.

8. How we will handle complaints from residents, service users & their representatives.

8.1 Housing Services will apply a two-stage complaints process.

8.2 Any complaint relating to Housing Services, howsoever received, must be logged with the Housing Reviews and Complaints Team immediately upon receipt. All complaints must be logged and acknowledged as a Stage 1 complaint within five working days, after clarifying with the customer any issues which are unclear. The acknowledgement must set out our understanding of the outstanding issues and any outcome/s the resident or service user is seeking.

8.3 The Housing Reviews and Complaints Team will then work personally with the

resident, service user or their representative to understand their complaint, and agree a preferred method and frequency of contact. The Housing Service will not unreasonably refuse to accept a complaint unless the criteria in Section 6 and 15 are met, and the reasons why it is not an acceptable complaint will be explained fully, in writing, within ten working days. The communication will also outline the process of recourse to the Housing Ombudsman at this stage, should the resident, service user or their representative wish to challenge the decision.

- 8.4 Where it is identified that the resident or service user has a legal entitlement to redress, then a resolution should still be offered where possible, however, legal advice should be sought about how any offer of resolution should be worded.
- 8.5. Once the complaint is accepted, the Housing Reviews and Complaints Team will then work with Service Managers to fully investigate, work inclusively towards a positive resolution, and provide a formal response, within the timescales set out in Section 9. Should there be any adverse findings to be made, then all parties to the complaint, including any staff members, must be given an opportunity to comment before a final decision is made.
- 8.6 If an extension of time is needed to produce a resolution / response then an explanation and a date for response must be agreed with the resident, service user or their representative. The extension of time should not exceed a further ten working days without good reason. Where an extension period cannot be agreed, then the complainant will be provided with the relevant Ombudsman details, should they wish to challenge the Council on the standards.
- 8.7 If the resident, service user or their representative remains dissatisfied with any outcome, the complaint will be progressed to Stage 2. Requests for escalation to Stage 2 must be provided to the Housing Reviews and Complaints Team within twenty working days of the stage 1 response being issued. If there are exceptional circumstances why this request was not made within this timeframe this may be extended. Customers are not required to explain their reasons for requesting a Stage 2 consideration. The Housing Reviews and Complaints Team will make reasonable efforts to understand why a customer remains unhappy.
- 8.8 If we have accepted the complaint and responded at Stage 1, we would only refuse to escalate the complaint to Stage 2 for either of the following reasons:
 - If the complaint should not be looked at further because it could compromise legal proceedings to do so.
 - If it has now become clear that this complaint has previously exhausted the complaints process.

Where it is decided the complaint will not be escalated, the reasons why will be explained to the complainant fully both verbally and in writing, within ten working days. The communication will also outline the process of recourse to the Housing Ombudsman at this stage, should they wish to challenge the decision.

- 8.9 Where an escalation has been accepted, then Stage 2 will be acknowledged within five working days, with the acknowledgement setting out the full understanding of the outstanding issues and any outcome/s the resident or service user is seeking. A formal written response will be provided to the complainant within twenty working days, detailing the process of recourse to the Housing Ombudsman, should they remain dissatisfied once the internal process has been exhausted. If an extension of time is needed, see section 8.6. If any adverse findings are to be made, then all parties to the complaint, including any staff members, must be given an opportunity to comment before a final decision is made.
- 8.10 All complaint responses must be sent to the resident, service user or their representative when the answer to the complaint is known, not when the outstanding actions required to address the issue are completed. Outstanding actions must still be tracked and actioned expeditiously, with regular updates provided to the resident, service user or their representative.
- 8.11 Consider incorporating additional complaints made during any investigation period if they are relevant and if the response has yet to be issued. Where the response has been issued, or investigation would unreasonably delay the response, then a new complaint should be opened.
- 8.12 Where the problem is a recurring issue, any older reports should also be considered as part of the background work to the complaint, if this will help to resolve the issue for the resident.
- 8.13 The complaint handler will always:
- Approach all complaints acting independently, sensitively and with an open mind free of bias, prejudice, or conflict of interest.
 - Address all points in the complaint, provide clear responses and reasons for decisions, referencing any relevant law, policy or best practice applied in reaching the decision.
 - Will have access to any staff at all levels to facilitate quick resolution and will have the authority and autonomy to act to resolve any dispute quickly and fairly.
 - Give residents and service users the opportunity to set out their position and / or have a representative deal with their complaint on their behalf, and to be accompanied / represented at any meeting with the complaint handler, where it is reasonable to do so and if not already done so.
 - Consider all information and evidence carefully.
 - Keep the complaint confidential as far as possible, with information only disclosed if necessary to properly investigate the matter, including the identification of individual staff members or contractors.
 - Give any complainant, Officer or Contractor who is subject to the complaint, a chance to set out their position and comment on any adverse findings before a final decision is made.
 - In any response, there will be, in clear plain language, an address of all points raised in the complaint and clear reasons for any decisions,

referencing the relevant policy, law and good practice where appropriate.

9. Timeframes for Responding to Complaints

Logging and acknowledgement (All)	Five working days
Stage 1 response (Complaint not accepted)	Ten working days
Stage 1 response (Complaint accepted)	Ten working days from acknowledgement of complaint
Request to escalate to Stage 2	Must be received within twenty working days following the Stage 1 response
Stage 2 Response (Complaint not accepted)	Ten working days
Stage 2 response	Twenty working days from acknowledgement of Stage 2 complaint
Responding to the Housing Ombudsman	As directed by the Ombudsman (15 days)

10. Appropriate Remedies for Complaints

10.1 Where something has been found to have gone wrong, we will acknowledge this and clearly set out the actions already taken, or intended to be taken to put things right, and by when. Complaints can be resolved in several ways. We intend that any remedy offered reflects the extent of all service failures, and the level of detriment caused to the resident as a result. Appropriate remedies can be provided at any stage of the complaints process without the need for escalation.

10.2 Such remedies may include:

- Acknowledging where things have gone wrong.
- Providing an explanation, assistance, or reasons.
- Apologising.
- Acting promptly if there has been delay.
- Reconsidering or changing a decision.
- Amending a record.
- Providing a financial remedy (See Appendix 1 – Compensation Matrix)
- Changing Policies, Procedures and working practices, with inclusion of a resident panel and within the confines of legislation and regulation.

10.3 The factors to consider in formulating a remedy may include, but are not limited to:

- Length of time that a situation has been ongoing.
- Frequency with which something has occurred.
- Severity of any service failure or omission.

- Number of different failures.
- Cumulative impact on the resident.
- Any circumstances or vulnerabilities of the resident

10.4 Financial compensation may also be considered with regard to payments for quantifiable losses incurred, time lost, distress and inconvenience caused to the complainant. Please refer to the Compensation Matrix in Appendix 1.

11. **Suspending Complaints**

11.1 Investigations may be suspended if there are concurrent investigations for:

- Adult and child safeguarding.
- Court and/or Tribunal proceedings.
- Grievance & Disciplinary.
- Criminal proceedings.

11.2 Once concluded, any outstanding issues in relation to the complaint or enquiry can be considered if it is deemed appropriate to do so. A Tier 4 Manager, or above, will make the decisions to suspend and/or to continue a complaint or enquiry.

12. **Discontinuing Complaints**

12.1 Housing Services can decide to stop any investigation or review of a complaint or enquiry at any time if the resident or service user fails to respond to requests for further information. This will only happen if contact has been attempted and recorded at least three separate times by different methods (where we have alternative contact methods, such as email addresses, telephone numbers or postal addresses) and no response has been received. The decision to discontinue a complaint or enquiry will be made by a Tier 5 or above Manager and sent in writing by letter or email.

13. **Withdrawing Complaints**

13.1 A complaint may be withdrawn verbally or in writing at any time by the Member, MP, resident or service user, or their representative. When this occurs, the Officer or Manager handling the complaint will write a response, confirming the withdrawal and advising them that if their intention has been misunderstood, to let us know as soon as possible. We reserve the right to withdraw 'complaints' that are logged on internal systems where they do not fall within the definition of a complaint under this policy.

14. **Reopening Complaints**

14.1 A Member, MP, resident, or service user can request that their enquiry or complaint is re-opened if:

- We have misunderstood their intention to withdraw their complaint.

- Their complaint was discontinued due to them having reasonable grounds for not responding.

14.2 A Tier 5 Manager or higher will consider and, if appropriate, authorise the reopening of the complaint.

15. **Unreasonable behaviour & vexatious complaints**

15.1 Residents or service users who pursue complaints against Housing Services in an unreasonable manner, or where we deem them to be persistent or vexatious, will be dealt with appropriately, ensuring that other residents or service users or Housing Services staff are not adversely affected. Examples are, but are not limited to:

- Refusing to specify or agree the grounds of a complaint or the outcomes sought.
- Not accepting that certain issues are not within the scope of the complaint procedure.
- Not cooperating with the complaint investigation process, despite guidance and offers of assistance being made.
- Insisting on only dealing with one specific member of staff who is unable to address their complaint.
- Making multiple and sustained contacts with the Housing Services team through various communication channels about the same matter.
- Making multiple and sustained contacts through Members
- The use of a 'scatter gun' approach in pursuing complaints with multiple members of the organisation and/or external organisations, despite being informed it is not necessary to do so and so makes or has made excessive demands on the time and resources of staff.
- Sends repeated, persistent, or abusive communications in connection with the same complaint.
- Makes or publishes derogatory statements or remarks about staff members or the Housing Service, or otherwise harasses, abuses, threatens, or intimidates staff on repeated occasions despite being formally advised this is unacceptable.
- Makes unjustified and unsubstantiated complaints about staff dealing with the complaint.
- Changes the basis of the complaint, or introduces knowingly false, trivial, or irrelevant information as the investigation proceeds, which they expect to be considered and commented on.
- Refuses to accept a decision made on a complaint, repeatedly arguing points with no new evidence or insufficient evidence and persists in pursuing a complaint where the Complaints Policy has been fully and properly implemented and exhausted.
- Repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint has been addressed or is groundless)
- Is known to have recorded meetings or face to face/telephone conversations without the prior knowledge and consent of other parties

involved.

15.2 It is not possible to devise a single strategy to deal with complaints that are pursued unreasonably, or which are persistent or vexatious, as each case must be looked at on its own merits. If a Tier 4 manager, or in their absence a Assistant Director, considers the behaviour is unreasonable, the following procedure will be followed:

- We will inform the resident or service user through an appropriate medium as to why we feel their behaviours or actions are unacceptable.
- We will give opportunity to change their behaviours within a reasonable timescale before taking any further action.
- Should the behaviours persist, evidence will be gathered and presented to a Tier 4 Manager or Assistant Director.
- The Tier 4 Manager or Assistant Director will review the evidence and then decide on any restrictions to be applied and how long these should last.
- Restrictions will always be reasonable, proportionate, and balanced, based on the nature of the issues established and will not aim to stop the resident or service user from accessing appropriate housing services.

15.3 The Housing Service can apply restrictions in the ways the resident or service user can access its services, which may include one or more of the following:

- The Council will take no further action on their complaint.
- Their use of the services complaints system will be limited to a single point of contact or one form of contact only.
- They may be placed on the Staff Safety Register if it is deemed there is a risk to staff, and in accordance with the Council's staff safety register procedures
- The Housing Service will not respond to any further contact unless legally obligated to do so.
- Their right to enter Council premises will be restricted or removed.
- Legal action may be taken, including injunctions or court orders to control their behaviour and communications.

15.4 The resident or service user will be notified of any restrictions applied to them in writing within five working days of the decision. There is no right of appeal regarding the implementation of this section of the Policy. We would, however, direct the customer to the Housing Ombudsman should they not agree with the application of any such restrictions. Information concerning the restrictions will be shared with relevant staff. This information will also be registered on the customer's record whilst restrictions are in force.

16. **How to complain**

16.1 Residents and service users can complain in person, over the telephone, in

writing, by email and digitally.

16.2 To complain by telephone then resident, service users and their representatives should telephone 01527 64252 during office hours and state to the customer service team if they are unhappy with a situation that they wish to have rectified or wish to make a complaint about the service that they have or have not received.

16.3 To complain by email, residents, service users, or their representatives should address their complaint to housingreviewsandcomplaints@bromsgroveandredditch.gov.uk

16.4 To complain in writing correspondence should be sent to:

Housing reviews and Complaints
Town Hall
Walter Stranz Square
Redditch
B98 8AH

16.5 To complain digitally residents and service users and their representatives should use this link to our website: <https://www.redditchbc.gov.uk/my-home/housing-complaint-or-enquiry/i-am-a-council-tenant.aspx>

17. **Equality**

17.1 The Housing Service will make this Standard available in a clear and accessible format for all residents and service users. The Standard will be available on the Council's website and a copy in the Town Hall.

17.2 The Housing Service will comply with the Equality Act 2010 and may adapt normal policies, procedures, or processes to accommodate an individual's needs in line with the Act and ensure that relevant officers are appropriately trained to deal with such requests.

18. **Monitoring and Review**

18.1 Systems will be in place to ensure full compliance with this standard.

18.2 At the conclusion of the complaint, the resident or service user will be contacted to undertake quality and assurance checks. While satisfaction will be measured, it is acknowledged that some outcomes might never be satisfactory for the resident or service user, and this will be a consideration in measuring and reporting on satisfaction data.

18.3 Complaint and enquiry reports for Housing Services will be shared and reviewed with Housing Management Team at least quarterly and the Corporate Leadership Team, with the intention of taking collective responsibility for shortfalls identified through complaints and maintaining professional standards in dealing with

complaints. Complaints performance will also be reviewed quarterly with the Portfolio Holder for Housing.

18.4 Housing Services will report back on wider learning and improvements resulting from complaints in the annual report, more regularly through service wide web pages to residents, service users and elected members.

18.5 Where the monitoring and review process identified a need to change or amend policies, procedures and working practices, within the bounds of legislation and regulation, then the Housing Service will make every effort to engage residents and service users in that process.

18.6 This Standard will be reviewed annually, at the same time as the requirement for the Annual Self- Assessment, and at any time there is a significant restructure and / or change in procedures. The outcomes must be reported to members, published on the website and in the annual report.

18.7 Indicators of success will include positive feedback from users of the Policy, a continuing trend of learning and improvement within the Housing Service, empowered and efficient staff and resident and service user satisfaction.

19. **Legislation and Guidance**

- The Housing Ombudsman Complaint Handling Code
- The Equality Act 2010
- The Housing Act 1996 (as amended)

20. **Related Policies and Procedures**

The Corporate Complaints Policy
Appendix 1 – The Compensation Matrix
Best Practice for Handling Member Enquiries and Escalations
Attached as PDF

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REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

Housing Regulator: Tenant Satisfaction Measures 2024/25

Relevant Portfolio Holder	Councillor Bill Hartnett
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Simon Parry and Judith Willis
Report Author	Job Title: Assistant Director of Environmental and Housing Property Services Contact email: simon.parry@bromsgroveandredditch.gov.uk Contact Tel:
Wards Affected	ALL
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Housing
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS**The Executive Committee RESOLVE that:-**

- 1) The Council's 2024/25 Tenant Satisfaction Measures and the Housing Interim Improvement Plan be approved.**
- 2) A quarterly update on the Tenant Satisfaction Measures (Landlord) and progress against the Housing Improvement Plan are reported in future to the Executive Committee.**

2. BACKGROUND

- 2.1 Following the passing of the Social Housing (Regulation) Act in July 2023, the Regulator for Social Housing (RSH) introduced a new Regulatory Framework for social housing providers including revised consumer standards in April 2024. The framework requires the inspection of each social housing provider over a 4 year period. This inspection gathers evidence and assesses providers against the four Consumer Standards (Safety and Quality, Transparency, Influence and Accountability, Neighbourhood and Community and Tenancy).
- 2.2 Redditch Borough Council (RBC) is currently in the process of completing an inspection with the final report from RSH anticipated to be published in July 2025. Through the feedback given to date as part of the inspection process, known gaps when reviewing the Consumer Standards and the feedback given through the Tenant Satisfaction Measures (TSM) an interim Housing Improvement Plan has been developed and is included at Appendix 1. At this stage no immediate gaps have been identified with the Tenancy Standard. The

Improvement Plan will form an integral part of the Service Business Plans being developed across Housing. A further report based on the results of the Inspection together with an updated improvement plan will be produced in due course for a future meeting of the Executive Committee. In addition, it is proposed to provide a quarterly update on the Landlord TSM and progress against the Housing Improvement Plan contained within this report and for meetings to be held with the Portfolio Holders for Housing and Performance, Engagement and Governance.

- 2.3 Alongside the consumer standards, a key element of the Framework are the TSMs, which place a responsibility on all social housing landlords, in England, to return performance information, so that each provider can be assessed for how well it is providing good quality homes and services.

2.4 **Tenant Satisfaction Measures**

The TSM document sets out 22 measures covering 5 themes.

1. Keeping Properties in good repair
2. Maintaining Building Safety
3. Respectful and helpful engagement
4. Effective handling of complaints
5. Responsible neighbourhood management

Of the 22 measures they are split between those that the **landlord** is required to measure directly (10 No.) and those that are measured by **tenant perception surveys** (12 No.)

These new requirements came into force on 1st April 2023 with RBC submitting results in June 2024. This requirement is annual, and submissions are recorded via the RSH's portal between April and June 2025 for the 2024/5 financial year.

Tenant Perception Surveys

Approach

- 2.5 The Regulator has set out a strict set of technical requirements to ensure the surveys follow an identical set of questions across the Sector, so that there is consistency, with the only variable being the inclusion of the name of the Housing Organisation. Included in these requirements are the identical range of answers based on a range of very satisfied to very dissatisfied, and also strongly agree to strongly disagree for one question. In order to calculate the outcome, the

technical requirements state that satisfaction is a total of very satisfied and fairly satisfied divided by the total number of responses to the question. This means that those that were neither satisfied not dissatisfied are excluded.

- 2.6 To undertake the tenant perception surveys the Council have engaged with We Love Surveys, who specialise in surveying customers for a range of clients and industries. A total of 654 responses were received which equates to the statistical confidence levels contained with the technical requirements and give a +/- 4% statistical confidence. The returns were predominantly via text messages with responses also invited via telephone survey and website.

3. OPERATIONAL ISSUES

Summary of results

- 3.1 When compared to the results from 2023/24 there has generally been an increase in satisfaction levels although the Council still fall below the median level across other Social Housing Providers. For the 2024/25 survey the Council included free text comment boxes for 4 key areas, Overall Satisfaction (TP01), Satisfaction with time taken to complete Repairs (TP03), Providing a home that is safe (TP05) and Complaint Handling (TP09).

TP01: Overall Satisfaction with Housing Services (56.7%)

- 3.2 The comments, which 70.8% of respondents made, are most commonly categorised as repairs and maintenance delays, responsiveness across services and frustration with communication. The information received will assist in informing the development of an improvement plan across the Housing Service that will be monitored and shared with the Executive Committee in due course.

TP02: Satisfaction with Repairs (66.7%)

TP03: Satisfaction with time taken to complete repairs (60.9%)

TP04: Providing a home that is well maintained (55.5%)

- 3.3 Whilst the results for 2024/25 are an improvement of 13.2%, 10.8% and 9.7% (respectively) when compared to results from 2023/24, they are still below the median levels across the sector. The service is currently going through a lot of change with 2024 seeing over 20 new permanent employees recruited into the Housing Property Services team. The Housing Property Services Team are currently testing the Total Mobile solution to allow more effective scheduling of works, tenant updates on progress and appointments as well as better performance management capabilities via dashboards. In July 2025, Internal Audit are to undertake a

Executive Committee

10th June 2025

review of the repairs service that will further influence improvements required.

- 3.4 Key issues identified from the free text comments are long wait times for repairs, delays in addressing issues, unclear timelines and lack of communication. Having reviewed our website the Repairs Policy is not publicised nor specific details around the priority codes covering emergency, urgent and non-urgent works. Whilst work is ongoing with Total Mobile, the Council have developed over the course of the last month Power Bi reports that provide performance data across the repairs service to allow more effective monitoring in the interim. The Council have post inspections of 10% of works undertaken which will assist in identifying any workmanship issues. Further work is required to provide solutions to the issues raised.
- 3.5 The Council is currently working with TPAS (Tenant Participation and Advisory Service) to review our tenant engagement offer with a report will be provided at a future Executive Meeting, regarding key actions and any associated resources required to meet the needs of the Consumer Standards regarding tenant engagement. However, in the interim the Council is liaising with them, given the feedback from the TSMs to look at setting up focus/working groups with tenants to further identify service improvements.

TP05: Provide a home that is safe (61.7%)

- 3.6 There was a 14% improvement when compared to the previous year however to further understand the response this question was also supplemented by the free text comments option. Within this the key area of concern was maintenance issues with issues such as doors, windows and mould together with kitchen and bathroom concerns. The Council has suffered from a lack of investment for a few years however, the current Capital Programme is working towards making all of the Council's properties being compliant with the Decent Homes Standard.

TP06: Listen to views and acts upon them (44.4%)

TP07: Keeps tenants informed (48%)

TP08: Treat tenants fairly and with respect (58.1%)

- 3.7 This set of scores reinforces the need to engage more effectively with the Council's tenants both at a strategic and operational level to ensure the authority receives feedback about services and demonstrates how the Council has responded. The authority needs to be more proactive with communication on key issues such as Repairs, Policy Changes and Projects for example increasing the frequency of key messages around these subjects. The work the Council is undertaking with TPAS will give a more rounded view of how the Council engages the customer base. With

regards to fairness and respect, whilst this has increased in the scores when compared to last year, the Council will need to reinforce this further through staff training, improved customer service, and greater equality and diversity. This will be included in a report to set out the Council's improvement plan across the Consumer Standards.

3.8 **Satisfaction by Characteristics**

In general terms the Housing Service do not hold a full set of tenant profile information across the various characteristics however work is ongoing to capture this information within our housing management system utilising a 'make every contact count' philosophy covering telephone calls to services across housing as well as through tenancy sign ups and the tenancy audits being undertaken. To assist this, the Housing Service are producing a resident profiling script so that the Council can maximise the information held on our system to map issues and trends together with being able to tailor our service appropriately to remove any barriers.

3.9 **Age**

Looking at the satisfaction by age of respondent approximately 47% of responses were from 25-54 year olds with the 3 age groups below scoring significantly lower than those in older age categories.

25-34 - 39.2%
35-44 - 40.2%
45-54 - 52.0%

3.10 **Ethnicity**

Across the ethnicity group the highest scoring were Asian (71.4%) and Black (66.7%).

3.11 **Property Types**

Across the Property types those living in flats scored the lowest (48.9%)

Across our flats Housing Property Services are mobilising the new caretaker service which will ensure our communal areas are clean, in good condition (with required repairs reported) and clear from combustible materials. The areas already benefit from good communal lighting and an ongoing programme of security door and fire door replacement is improving security and safety to each block.

3.12 **TP09: Complaints Handling (21.7%)**

Satisfaction levels with complaints handling is a significant issue across many housing providers and has remained the lowest level of satisfaction

of all questions this year. The level of respondents on this question indicates that the number is significantly higher than formal complaints received. Feedback from the comments made include frustration with the council's responsiveness, with delays, poor communication and unresolved repairs and maintenance issues being cited most commonly. This is one of the key areas the Housing Service are prioritising for improvement with further engagement with tenants as well as seeking to understand from our peers how they have sought to improve in this area.

3.13 TP10: Communal Areas kept clean and well maintained (42.4%)

The split between satisfied and dissatisfied was equal with known inconsistencies within the service currently. The mobilisation of the caretaker service as identified above will assist in improving the quality of the communal areas in which our housing is situated. The Council will seek further, more detailed, feedback from customers to build on the feedback received from the summer 2024 roadshows to continually improve our communal areas.

3.14 TP11: Positive contribution to the neighbourhood (44.7%)

The Council will need to engage with our customers to understand the responses to this question in more detail. Whilst there are good examples of improvements made in specific areas such as the Safer Streets project work, further investment is required to design out crime and generally improve areas. The Housing Service are seeking to establish, in conjunction with our customers, a set of Estate Care Standards.

3.15 TP12: Handling ASB (40.6%)

Whilst Housing Services have developed strong relationships with the Police and have demonstrable evidence of dealing effectively with cases that impact on individuals and areas, further work is required to understand from our customers how the Council can further improve how ASB is dealt with.

3.16 Benchmarking

3.17 The RSH, in November 2024, collated all social housing providers data from their responses to the TSMs covering both tenant perception survey results as well as the measures covering the Landlord Measures. The table below sets out our performance for 23/4 as a comparison with 24/5 whilst also providing a benchmark against the median results across the sector.

REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

Table1: TSM 24/5 Results and Comparators

TSM Code	TSM Question in Full	% Satisfied (adjusted)	2024 % Satisfied (adjusted)	Compared to 2024 Results	TSM Headline Report 23/4 Median - Perception Survey Results
TP01	Taking everything into account, how satisfied or dissatisfied are you with the service provided by Redditch Borough Council?	56.7%	47.4%	9%	71.30%
TP02	How satisfied or dissatisfied are you with the overall repairs service from Redditch Borough Council over the last 12 months?	66.7%	53.5%	13%	72.30%
TP03	How satisfied or dissatisfied are you with the time taken to complete your most recent repair after you reported it?	60.9%	50.1%	11%	67.40%
TP04	How satisfied or dissatisfied are you that Redditch Borough Council provides a home that is well maintained?	55.5%	45.8%	10%	70.80%
TP05	Thinking about the condition of the property or building you live in, how satisfied or dissatisfied are you that Redditch Borough Council provides a home that is safe?	61.7%	48.0%	14%	76.70%
TP06	How satisfied or dissatisfied are you that Redditch Borough Council listens to your views and acts upon them?	44.4%	34.4%	10%	60.40%
TP07	How satisfied or dissatisfied are you that Redditch Borough Council keeps you informed about things that matter to you?	48.0%	44.4%	4%	70.30%

REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

TP08	To what extent do you agree or disagree with the following: Redditch Borough Council treats me fairly and with respect?	58.1%	51.5%	7%	76.80%
TP09	How satisfied or dissatisfied are you with Redditch Borough Council's approach to complaints handling?	21.7%	21.6%	0%	34.50%
TP10	How satisfied or dissatisfied are you that Redditch Borough Council keeps these communal areas clean and well maintained?	42.4%	41.8%	1%	65.10%
TP11	How satisfied or dissatisfied are you that Redditch Borough Council makes a positive contribution to your neighbourhood?	44.7%	39.4%	5%	63.10%
TP12	How satisfied or dissatisfied are you with Redditch Borough Council's approach to handling anti-social behaviour?	40.6%	39.6%	1%	57.80%

3.18 Summary

The results identified through the tenant perception survey including the comments provided, give officers good insight into the services the Council are delivering. To improve, as a consequence, the Council are currently developing a Housing Improvement Plan. The plan is pulling together feedback from this survey, the ongoing work with TPAS to re-engineer our customer engagement as well as ensuring the Council meet the RSH Consumer Standards. This plan will form an integral part of the report that is scheduled for a future meeting of the Executive.

3.19 Landlord TSMs

3.20 RP01: Homes that do not meet the Decent Homes Standard

At the end of the financial year **4.17%** of our Housing Stock was non-decent in accordance with the Decent Homes Standard, which represents 442 properties. The majority of the reasons for non-decency fall within the State of Repair category of the Decent Homes Standard and represents elements such as Roofing, Electrical, Gas, Kitchens and Bathrooms. Programmes of work are being identified to ensure that these items are remedied.

3.21 Stock Condition Data

To ensure the Council can report against this robustly Housing Property Services have a rolling programme of Stock Condition Surveys to our properties which are undertaken by an External Consultant on an annual basis. Through this year the target is to complete 1,400 surveys, to update our data. In 2019/20 the first Stock Condition surveys undertaken for many years were completed which covered approximately 55% of our Housing Stock at the time, which then formed the basis of the current 5-year capital investment programme within the report to Executive in February 2023. The Council completed surveys for a further c20% of our housing stock last financial year however best practice advises that data is only used for a 5 year period, therefore a programme, to complete all of our stock over the next 3 financial years including this, has been established.

Currently therefore the percentage of properties with a Stock Condition Survey undertaken in the last 5 years is 19.71%.

3.22 RP02.1: Repairs completed within target timescale – Proportion of non-emergency responsive repairs completed within the landlord's target timescale

Executive Committee

10th June 2025

RP02.2: Repairs completed within target timescale – Proportion of emergency responsive repairs completed within the landlord's target timescale

- 3.23 In conjunction with the Business Improvement Team the Repairs Team have been building Power Bi reports in order to provide performance information. The tables below represent the percentage of Works Orders (WO) closed on the system together with the percentage that have been closed within the target timescales for each Priority Code.

Priority 1	Emergency	24 hrs
Priority 2	Urgent	5 working days
Priority 3	Routine	20 working days

These reports have identified issues related to duplicate WO and errors in closing down correctly on the system, as such a data cleansing process is in progress together with associated training for all officers responsible for closing down these items. This has resulted in identify as at 14th May 2025 that 2,364 repairs WO are currently showing as overdue, which the data cleansing will reduce further. Where Housing Property Services have identify shortfalls in capacity to deliver this additional capacity, through either External Contractors or Agency support for our internal teams, will be provided. The Repairs service still currently operates on a paper-based ticket system however it is in the final stages of testing for Total Mobile a new ICT based scheduling platform that will provide greater efficiencies in the delivery of the service as well as enhance the customer journey through timely updates to customers on the appointments and progress of their Repairs WO.

Executive Committee

10th June 2025

Repairs Performance		
Raised	Closed%	ClosedInTarget%
25.8K	92.0%	68.1%
P1 Repairs Performance		
Raised	Closed%	ClosedInTarget%
4.5K	98.5%	77.9%
P2 Repairs Performance		
Raised	Closed%	ClosedInTarget%
8.7K	95.0%	69.9%
P3 Repairs Performance		
Raised	Closed%	ClosedInTarget%
12.6K	87.6%	62.8%

3.24 **BS01: Gas safety checks**

3.25 The key statutory requirement is that RBC adhere to the Gas Safety (Installation and Use) Regulations 1998 as amended. It is a legal requirement for RBC to perform a gas safety check every twelve months and to maintain the associated paperwork.

3.26 The RSH set out **BS01 – Gas Safety Checks** ‘this measure will be based on the percentage of homes that have had all the necessary gas safety checks’.

Performance: 100%

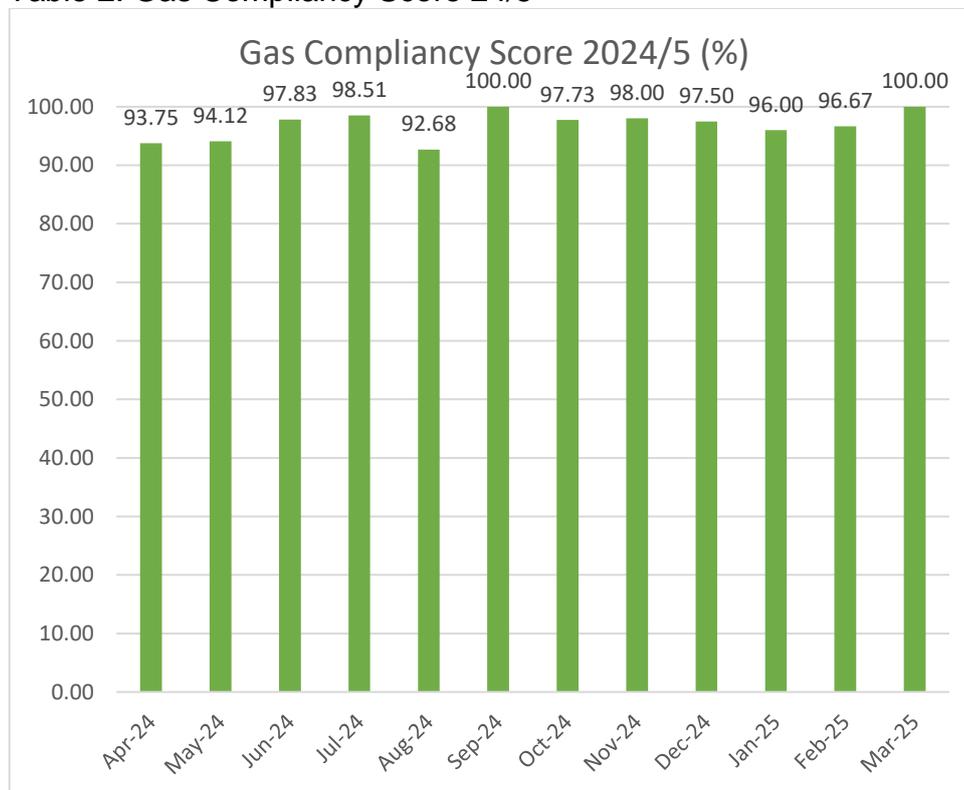
3.27 All current gas safety checks are in place for both our domestic boilers and the newly managed Communal Boilers. Work to improve the quality and efficiency of boilers continues with boilers replaced on both a reactive basis (where beyond economical repair) or planned replacement due to age and efficiency.

3.28 There are 196 properties that have their gas supply capped. These properties comprise of current voids and customers who do not want or can't afford gas. These properties are identified and shared with the Neighbourhood and Tenancy team in order to provide opportunity for tenancy visits to ensure there is support for the household.

3.29 Gas Quality Assurance (3rd Party Audits)

The In-house Gas Team are subject to audits of work undertaken by a third-party company, Morgan Lambert. Certification is passed to them monthly in order to assess the quality and accuracy of certification, feedback from the customer on their satisfaction with the service delivered by the RBC engineer, and finally an assessment of the work undertaken for compliance with regulations and manufacturer's instructions. The following table illustrates the monthly results for the financial year.

Table 2: Gas Compliancy Score 24/5



3.30 Gas Safe Inspection

An inspection, by Gas Safe, of the Housing Property Services Gas Team, was completed in November 2024 which comprised of a desk top audit of our gas management processes and procedures and a gas safety inspection of a selection of Gas Engineers. There are 3 possible outcomes to the audit (Satisfactory/Work Required/Unsatisfactory) and the team reached a Satisfactory standard which is the highest possible rating and correlates with the team's focussed efforts and commitment in this regard.

Executive Committee

10th June 2025

3.31 BS02: Fire safety checks

The key statutory requirement is the Regulatory Reform (Fire Safety) Order 2005 (RRO) which requires Redditch Borough Council (RBC) to undertake regular assessments of all communal areas within the Council's housing stock, by a competent person. This assessment of a building is to ensure that it is at least maintained, as designed, to protect the integrity of fire safety features such as compartmentation and escape routes.

3.32 There is a rolling programme of inspection for the FRAs with designated properties being part of an annual risk assessment (Sheltered Accommodation) with the remainder (General Needs) being undertaken on a 3-year cycle. The FRAs are undertaken by external consultants Ridge and Partners LLP.

3.33 The RSH set out **BS02 – Fire Safety Checks** -'this measure will be based on the percentage of homes in buildings that have had all the necessary risk assessments'.

Performance: 100%

3.34 Through the FRAs undertaken significant numbers of remedial actions were identified. In order to tackle these programmes of interventions including fire compartmentation works, review/upgrade of fire alarms, replacement communal internal and flat entrance doors and upgrading of signage have been ongoing. The programme prioritised the previously designated 'sheltered accommodation' blocks of low rise flats eg Ibstock House, Malvern House, Harry Taylor House etc, with these all complete. Beyond these property types the programme has then covered our 3 and then 2 storey buildings, unless there are higher risks based on the condition of the existing fire doors or measures within any property type, at which point they will be accelerated through the programme.

REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

3.35 The outstanding remedial works from the FRAs are included in the table below.

Table 3: Fire Remedial Actions (as at 29/5/25)

	No. of high-risk actions - Serious	No. of medium risk actions – Minor	No. of low-risk actions – Best Practice
Overdue FRA remedial actions (< 3 months)	15	460	103
Overdue FRA remedial actions (3-6 months)	10	139	52
Overdue FRA remedial actions (6-12 months)	159	742	95
Overdue FRA remedial actions (12+ months).	604	424	113
Totals	788	1765	363

3.36 Initially the list of remedial actions totalled 6,189 however the work identified previously has significantly reduced this, noting however there is much work still to be undertaken. The serious items in Table 3 cover a large number of sites, examples of which, are works to fire doors, fire stopping, which equates to approximately 89% of outstanding serious actions, ensuring person centred fire risk assessments for highly vulnerable people are undertaken and in place and that an assessment is undertaken of any cladding materials. Works are in progress across a range of these issues, the budget for 25/6 for these works has been agreed at £1.5m with this to be projected forward until 2029/30 to ensure all fire doors are replaced/upgraded and associated fire stopping is completed. In the interim in order to mitigate the risks identified Housing Property Services are developing a programme of fire door inspections which is anticipated will be in place in July 2025. As part of the FRA the item most referenced for doors states

All flat entrance doors should be checked to see if they provide adequate fire resistance, have the correct ironmongery and operate correctly. The doors should be upgraded as necessary to achieve

FD30S standard, with a self-closing device capable of closing the door in its frame from any angle and overcoming the resistance of any latch.

Whilst all of our flats have existing fire doors these surveys will identify the standard of the doors in the interim to mitigate against the risks prior to replacement, where required, and inform the programme accordingly. .

The document that holds all of this data is being continuously updated as individual items are completed, with tasks allocated to various teams across the whole of the Housing Service. As part of our regular maintenance and surveillance of communal areas the new caretaking service (to be launched in the Summer, following a current recruitment exercise) will provide assurance that flammable objects are not stored within these areas together with timely reporting of any issues within the communal areas. Housing Property Services have ensured that emergency lighting and fire alarm testing and maintenance is undertaken and that flats have the relevant smoke alarms to help protect our tenants in the event of a fire.

3.37 **BS03: Asbestos safety checks**

The key statutory requirement is the Control of Asbestos Regulations 2012 (CAR2012) which requires Redditch Borough Council (RBC) to undertake an asbestos survey to confirm locations of asbestos containing materials within communal areas. Regulation 4 of the above legislation (CAR) places a specific obligation upon 'duty holders' (owners and/or those responsible for maintenance) to manage asbestos within non-domestic premises (including common parts of domestic dwellings). This requires identification of the location and condition of asbestos containing materials (ACMs), a corresponding risk assessment and written management plan to prevent harm to anyone who occupies or works upon the building. Although the regulations do not extend to domestic properties, Housing Property Services do have a duty of care under the Health and Safety at Work Act 1974 and the Management of Health and Safety Working Regulations 1999 to ensure the safety of our workforce and contractors when working within RBC properties.

- 3.38 All blocks have had asbestos surveys undertaken to the communal areas which categorised the presence and condition of any asbestos present. A programme of removal has been completed to remove poor quality asbestos from communal areas. Where Asbestos Containing Materials were left an annual reinspection regime is in place to ensure there has been no deterioration and therefore identified intervention in order to control the risk.

Executive Committee

10th June 2025

3.39 The RSH set out **BS03 – Asbestos Safety Checks** - Proportion of homes for which all required asbestos management surveys or re-inspections have been carried out.

3.40 **Performance: 100%**

3.41 **BS04: Water safety checks**

Under the Health and Safety at Work Act 1974 and the Control of Substances Hazardous to Health Regulations 2002, housing providers must assess and control the risk of exposure to legionella bacteria in water systems.

The RSH set out **BS04 – Water Safety Checks** - Proportion of homes for which all required legionella risk assessments have been carried out.

3.42 **Performance: 100%**

3.43 Through the issuing of the Risk Assessments for each of the 51 communal sites several actions have been identified these are listed in the table below. Monthly checks are undertaken by our Contractor to monitor water temperature, and our in-house Gas Team carry out a weekly flush of the systems. Work is ongoing to clear all outstanding remedial actions.

The outstanding remedial works from the Legionella Risk Assessments are included in the table below:

Table4: Legionella Remedial Actions

REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

LEGIONELLA REMEDIAL STATUS	Completed	In Progress	Grand Total
1.High	28	86	114
Calorifier		27	27
Combi Boiler	1	1	2
Deadleg	2	17	19
Distribution Services	14	9	23
Expansion Vessel		1	1
Representative Outlet	2	3	5
Risk of Persons being Exposed		8	8
Sentinel Outlet	7	16	23
Shower Head & Hose C&C	1	3	4
TMV's	1	1	2
2.Moderate	1	11	12
Calorifier		4	4
Expansion Vessel		1	1
Taps & Outlets	1	2	3
TMV's		4	4
3.Continue to Monitor	7	18	25
Calorifier		7	7
Representative Outlet	2	1	3
Sentinel Outlet	5	10	15
Grand Total	36	115	151

- 3.44 The outstanding remedial actions for our 51 sites, include a number of locations which consist of communal plant rooms, kitchens, laundry, shower, toilet, cleaner and outside tap facilities. The Gas Team have completed 24% of all remedial actions and 76% of all other outstanding High, Moderate and Continue to Monitor 'Risks' are scheduled and work in progress is planned to be completed by the end of June 2025. The highest risk items have been prioritised and consist of removing unused water services, regular sampling by our Contractor, removal of unused pipework, improvements to flow pressures and operating tap temperatures, clean and descales and replacement of faulty parts.
- 3.45 The risk assessments identified several high-risk sites that suffer from low water movement or no use. The Gas team, as part of their weekly monitoring, have investigated the use of these areas and are currently removing 34 redundant sites to eliminate any potential health issues or concerns which will reduce our sites to only 17 going forward.
- 3.46 Currently the 34 sites are scheduled for the strip out and removal of all unused water services by the end of May 2025. The other remaining 17 site facilities are being evaluated by Housing and Tenancy to reduce the risk of low water movement and best use of each location, including the upgrade of a number of sites to provide cleaning facilities for the new caretaking service.

Executive Committee

10th June 2025

3.47 BS05: Lift safety checks

3.48 Responsibilities for the inspection and maintenance of Lifts are covered by the Lifting Operations and Lifting Equipment Regulations 1998 (LOLER), and the Provision and Use of Work Equipment Regulations 1998 (PUWER). These regulations require that any equipment, including lifts, provided for tenants must be safe for use, properly maintained, and suitable for the environment. These works were part of the responsibilities previously undertaken by the Property Services and have since transferred to Housing for operational compliance.

3.49 The RSH set out **BS05 – Lift Safety Checks** - Proportion of homes for which all required communal passenger lift safety checks have been carried out. The Council's Insurer completes the necessary checks on these lifts and reports any issues that need remedial works. The lifts are generally 30+ years old and therefore have been added to the Capital Investment Programme for replacement. Works are currently ongoing to replace the lift at Auxerre House.

3.50 Performance 100%**3.51 Electrical**

3.52 Under the British Standard, BS 7671, Requirements for Electrical Installations (also known as the IET Wiring Regulations) Redditch Borough Council (RBC) are required to undertake regular assessments, Electrical Inspection Condition Report (EICR), by a competent person.

3.53 The RSH does not currently include a TSM for electrical works.

3.54 The EICR programme is designed to undertake a test based on a five year cycle.

3.55 Performance: 90.5%

3.56 To further enhance our opportunities for access the Council have developed, in conjunction with our in house and external Legal Teams, a similar 'warrant' type approach that is utilised by the Gas Team to provide entry to fulfil our compliance responsibilities.

3.57 Housing Property Services have identified issues with approximately 200 property records from 2020/21, whilst the data includes a date of testing and a certificate number, these certificates cannot be sourced, as such, these have been issued to a contractor to remedy by testing. As part of the Council's assurance regarding our records, it has asked

Executive Committee

10th June 2025

Internal Audit to include Electrical works in Housing Property Services within their Audit programme for 2025/6.

3.58 Remedial actions for EICR reporting are defined by a C rating as below:

- C1 immediately dangerous,

RBC do not allow its contractors to leave a C1 departure at time of test.

- C2 Potentially dangerous, safe at time of test, but could become unsafe should 1 protective measure fail.

RBC wait for the report to be returned and raise these as new works orders with a priority 3 target.

- C3 Improvement recommended, these do not comply with current regulations however don't pose a safety risk. These could be used to target a capital program.

3.59 The breakdown of outstanding remedial works is in the table below.

Table 5: Electrical Remedial Actions

< 3 Month		3-6 Months		6-12 Months		12+ Months	
Total	12	Total	13	Total	15	Total	18

3.60 Remedial actions are always in flux, but the time periods will be indicative of differing issues.

- < 3 months- will include new jobs, this number will always show the healthy turn around in works orders.

- 3-6 Months- will be indicative of jobs that have fulfilled the no access process and will have two no access calls attended and evidenced. These have been referred for tenancy support.

- 6-12 Months- These are a mixture of repairs at no access stage and reports the Electrical Team in Housing Property Services didn't receive on time therefore affecting our figures. Housing Property Services have been contract managing our partner contractors against the KPIs culminating in termination of the contract for one of our two contractors for this workstream.

- >12 Months, these mainly consist of vulnerable residents with very complex needs. Housing Property Services have worked with our third-

Executive Committee

10th June 2025

party solicitor to review our procedures and have mapped in Civica CX (Housing ICT System) a 'cases and tasks' workflow which is partially built and due to be tested and should allow us an auditable referral route for tenancy issues that is compliant with our no access process. This process can ultimately result in an access injunction, although instigates support in the first instance.

- 3.61 Properties with limited access to electrical points, e.g. hoarders, have long posed a risk for housing providers. These cannot be effectively tested due to limited access to points resulting in an unsatisfactory test result being recorded against such properties. Additionally, these properties can present extra fire risk due to cluttered escape routes and high density of combustible materials.
- 3.62 While Housing Property Services work with Housing Management as a supportive partner, RBC have instigated phased shutdowns where temporary points have been installed in accessible locations and disconnect inaccessible points.
- 3.63 To mitigate risks, Housing Property Services also install additional smoke detection as required and place these properties on a "High Risk" register which instigates an annual EICR reporting program. Annual testing in line with BS7671 wiring regulations risk assessment-based intervals, gives us a greater presence and quicker response should an issue arise. Whilst a resident will be being supported by Housing Management and can contact us anytime should they need to scale up an installation, annual testing also allows us to identify this and mitigate the risk of residents having unnecessary partial shutdown. A supply to critical systems such as cooking, chilling food, lighting etc is always allowed for.
- 3.64 Housing Property Services have initiated this for 2 residents currently, but have raised works orders for a further 15 in conjunction with Tenancy audits.
- 3.65 A programme is in place for EICR to Communal Areas to ensure communal areas all have a current certificate within the 5-year cycle.
- 3.66 **Performance: 100%**
- 3.67 Smoke and Carbon Monoxide Alarms
- 3.68 The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 requires landlords to provide smoke alarms to be fitted to each storey of premises used as living accommodation, similarly, where a room contains a solid fuel burning combustion appliance, then a carbon monoxide alarm is to be fitted. Work is ongoing to complete these

works to all outstanding properties, with completion anticipated by the end of the financial year, and forms an integral part of the properties where no access is provided.

3.69 **Smoke Alarms – Performance: 97.36**

3.70 **Carbon Monoxide Detectors – Current Performance: 98.33%**

3.71 **Complaints**

3.72 Details of performance related to complaints is set out within a separate report under this agenda.

3.73 **CH01.1: Complaints relative to the size of the landlord (Stage 1)**

3.74 Performance: 22.37 Stage 1 Complaints per 1,000 homes

3.75 **CH01.2: Complaints relative to the size of the landlord (Stage 2)**

3.76 Performance: 3.79 Stage 2 Complaints per 1,000 homes

3.77 **CH02.1: Complaints responded to within Complaint Handling Code timescales (Stage 1)**

3.78 Performance: 62% Stage 1 responses responded within the Housing Ombudsman's Complaint Handling Code timescale

3.79 **CH02.2: Complaints responded to within Complaint Handling Code timescales (Stage 2)**

3.80 Performance: 80% Stage 2 responses responded to within the Housing Ombudsman's Complaint Handling Code timescale

3.81 **Anti-Social Behaviour (ASB)**

3.82 The service since the restructuring in 2021 have developed a dynamic, functional and accessible ASB service for our customers, creating strong partnerships including the local Police. The service has undertaken many significant and highly complex enforcement actions including Civil Injunctions, Closure Orders and Discretionary and Mandatory Possession Orders against tenancy breaches.

3.83 **NM01.1: Anti-social behaviour cases relative to the size of the landlord**

3.84 Performance: 22.8 cases per 1,000 homes

Executive Committee

10th June 2025

3.85 **NM01.2: Anti-social behaviour cases (involving Hate Crime) relative to the size of the landlord**

3.86 Performance: 0.0 cases per 1,000 Homes

3.87 **Benchmarking**

3.88 The RSH, in November 2024, collated all social housing providers data from their responses to the TSMs covering both tenant perception survey results, as well as the measures covering the Landlord Measures. The table below sets out our performance for 24/5 when compared to the median results. There are improvements required across most areas, and these form part of the Housing Interim Improvement Plan included in this report and will be further updated in a report to Executive Committee following receipt of the RSH Inspection Report, in September.

REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

<i>TSM – Landlord Measures – RBC & Median (23/24)</i>	RBC – 24/25	Median
RP01: Homes that do not meet the Decent Homes Standard	4.19%	0.5%
RP02.1: Repairs completed within target timescale – Proportion of non-emergency responsive repairs completed within the landlord's target timescale	65.7%	81.3%
RP02.2: Repairs completed within target timescale – Proportion of emergency responsive repairs completed within the landlord's target timescale	77.9%	95.3%
BS01: Gas safety checks	100%	99.9%
BS02: Fire safety checks	100%	100.0%
BS03: Asbestos safety checks	100%	100.0%
BS04: Water safety checks	100%	100.0%
BS05: Lift safety checks	100%	100.0%
CH01.1: Complaints relative to the size of the landlord (Stage 1)	22.37 per 1,000 homes	42.5
CH01.2: Complaints relative to the size of the landlord (Stage 2)	3.79 per 1,000 homes	5.7
CH02.1: Complaints responded to within Complaint Handling Code timescales (Stage 1)	62%	82.3%
CH02.2: Complaints responded to within Complaint Handling Code timescales (Stage 2)	80%	83.6%
NM01.1: Anti-social behaviour cases relative to the size of the landlord	22.8 per 1,000 homes	35.5
NM01.2: Anti-social behaviour cases (involving Hate Crime) relative to the size of the landlord	0.0 per 1,000 homes	0.6

4. FINANCIAL IMPLICATIONS

- 4.1 All work undertaken through the delivery of services highlighted in this report are budgeted through the Capital and Revenue, Housing Revenue Account. As part of the development of an improvement plan where additional budgets are required to improve compliance and performance, these will be included in a separate report.

5. LEGAL IMPLICATIONS

Executive Committee

10th June 2025

- 5.1 The report sets out the requirements of legislation which the Council is required by law to adhere to.
- 5.2 Compliance is required with section 193 of the Housing and Regeneration Act 2008 as amended by the Social Housing (Regulation) Act 2023.
- 5.3 Inspections are carried out under section 201 to section 203A of the Housing and Regeneration Act 2008.

6. OTHER - IMPLICATIONS

Relevant Council Priority

- 6.1 This report supports the current Council Plan by providing Housing that is improved through the Housing Capital Investment Programme.

Climate Change Implications

- 6.2 The responsive, cyclical and planned maintenance of our properties seeks to ensure our Council Housing properties are well maintained, warm and safe. Included within our programme of works are projects to increase the thermal efficiency of properties.

Equalities and Diversity Implications

- 6.3 Through the delivery of Housing Services, the Council identify the needs of individuals and households in order to tailor services appropriately.

7. RISK MANAGEMENT

- 7.1 The key risk is failure to ensure our properties are well maintained, safe and compliant in accordance with the relevant regulations highlighted through this report. Work is ongoing to ensure compliance and will be further evidenced through the Housing Improvement Plan.

8. APPENDICES and BACKGROUND PAPERS

- 1 – Housing Interim Improvement Plan

REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

Appendix 1 – Housing Interim Improvement Plan

<u>Consumer Standard</u>	Action	Lead Officer	Target Date
<u>Safety & Quality</u>			
<i>Stock Quality</i>	Develop a 5 year rolling programme to ensure Stock Condition Surveys are undertaken to all Housing Stock	Simon Parry	Sep-25
<i>Decency</i>	Ensure the Housing Capital Programme reflects the volume and scope of works to meet the Decent Homes standard across all Housing stock	Simon Parry	Jan-26
	Undertake a review of the Housing Asset Management Strategy and the Housing Capital Programme developed for 2023-2027 in line with stock condition information	Simon Parry	Jan-26
<i>Health and Safety</i>	Finalise a plan for the completion for all outstanding remedial actions for Fire, EICR, and Legionella in appropriate timescales	Simon Parry	Sep 25
	Utilise the feedback from the TSM Tenant Perception Survey to improve on the results from the 24/5 survey on 'Feeling Safe'	Simon Parry	Jun-26
	Mobilise a fire door inspection programme	Simon Parry	Sep-25
	Undertake an independent review of the mitigation in place and the delivery programme for fire safety	Simon Parry	Dec-25
	Implement Total Mobile for Repairs and Maintenance	Simon Parry	Sep-25
<i>Repairs, Maintenance and Planned Improvements</i>	Communicate to customers the priority codes and Repairs Policy together with performance against these	Simon Parry	Jul-25
	Develop a working group with tenants to seek further feedback on improvements required to deliver a more effective Repairs service	Simon Parry	Dec-25

REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

Appendix 1 – Housing Interim Improvement Plan

	Use Repairs Performance Data to identify trends and root causes for improvements to be made and regularly monitor and manage performance	Simon Parry	Nov-25
	Mobilise the Caretaker Service to undertake regular cleaning, testing and inspection of Communal Areas	Simon Parry	Aug-25
<u>Neighbourhood and Community</u>			
ASB and Hate Incidents	Review data recording of Hate Incidents	Judith Willis	Sep-25
	Establish a procedure to keeps tenants informed of the progress of their ASB cases	Judith Willis	Sep-25
	Provide ASB performance data via the Quarterly Performance Reports to Executive Committee and to tenants via the website and annual report,	Judith Willis	Jul-25
<u>Transparency, Influence and accountability</u>			
Fairness and Respect	Ensure a programme of staff training is delivered to ensure tenants are treated with fairness and respect	Judith Willis/Simon Parry	Mar-26
	Develop a programme for embedding the Council's corporate culture work programme within Housing Services	Judith Willis/Simon Parry	Mar-26

REDDITCH BOROUGH COUNCIL

Executive Committee

10th June 2025

Appendix 1 – Housing Interim Improvement Plan

	Ensure that tenant profile data is collected more widely across all customers so that services can be more reflective of tenants needs, including establishing an 'Every Contact Counts' philosophy.	Judith Willis/Simon Parry	Jul-25
Diverse Needs	Develop and Implement the Customer Profile Action Plan, with milestones established	Judith Willis/Simon Parry	Jan-27
Engagement with tenants	Review the range of opportunities available for tenants to influence and scrutinise strategies, policies and services and implement improvements identified in accordance with best practice	Judith Willis/Simon Parry	Sep-25
	Continue work with TPAS to develop a robust tenant engagement offer with a future report to Executive Committee setting out key actions and required resources.	Judith Willis/Simon Parry	Nov-26
Information about landlord service	Develop and publish the Annual Housing Report for 24/5	Judith Willis/Simon Parry	Jul-25
	Implement a Tenants Portal within Cx	Judith Willis/Simon Parry	Jun-26
	Establish a communications strategy to regularly update tenants on services and performance	Judith Willis	Jan-26
Performance Information	Housing Performance Dashboard completed and performance reports provided to Executive and tenants.	Judith Willis/Simon Parry	Jan-26
Complaints	Recruit to two new posts of Complaints and Quality Officer	Judith Willis	Nov-25
	Undertake further engagement with tenants and learn from our peers how they have sought to improve complaint handling satisfaction	Judith Willis	Jan-26

REDDITCH BOROUGH COUNCIL**Executive Committee****10th June 2025**

Appendix 1 – Housing Interim Improvement Plan

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Hartnett	18/5/25
Lead Director / Assistant Director	Guy Revans	17/5/25
Financial Services	Debra Goodall	16/5/25
Legal Services	Nicola Cummings, Principal Solicitor - Governance	20/05/25
Policy Team (if equalities implications apply)	Rebecca Green	16/5/25
Climate Change Team (if climate change implications apply)	Matthew Eccles	19/5/25

Executive Committee
202510th June**Shareholders Committee Annual Report 2024/25**

Relevant Lead Member	Councillor Sharon Harvey
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Claire Felton, Assistant Director of Legal, Democratic and Procurement Services
Report Author Jess Bayley-Hill	Job Title: Principal Democratic Services Officer Contact email: jess.bayley-hill@bromsgroveandredditch.gov.uk Contact Tel: (01527) 64252 Ext: 3072
Wards Affected	No specific ward relevance
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Sustainability
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS

The Executive Committee is asked to consider the content of the Shareholders Committee's Annual Report 2024/25 and, subject to any changes, to RECOMMEND to Council that the report be noted.

2. BACKGROUND

- 2.1 The Shareholders Committee is required to produce an annual update to Council on the performance of Rubicon Leisure Limited.
- 2.2 The appendix to this report contains the Shareholders Committee's Annual Report for 2024/25.

3. OPERATIONAL ISSUES

- 3.1 The Shareholders Committee forms a key part of the governance structure for the Council's company; Rubicon Leisure Limited.
- 3.2 Arrangements for the operation of the Shareholders Committee were reviewed and reported for Members' consideration at the Annual Council meeting held in May 2024.
- 3.3 As a result of this review, a requirement was introduced, in the terms of reference for the Shareholders Committee, directing the Committee to report to Full Council annually on the performance of the trading activities of Rubicon Leisure Limited.

Executive Committee
202510th June

3.4 As this change to the terms of reference for the Committee was introduced in May 2024, this is the first time that an Annual Report has been produced on behalf of the Shareholders Committee.

3.5 The report is being presented for the consideration of the Executive Committee prior to Council because the Shareholders Committee is a sub-committee of the Executive Committee.

3.6 Subject to any amendments that Members may request to the content of the Shareholders Committee's Annual Report, the Executive Committee is invited to consider referring the report to Council for consideration. Members are asked to note that the Chair of the Shareholders Committee will be required to present the report for the consideration of Council.

4. FINANCIAL IMPLICATIONS

4.1 There are no specific financial implications.

5. LEGAL IMPLICATIONS

5.1 There are no specific legal implications.

6. OTHER - IMPLICATIONS**Local Government Reorganisation**

6.1 There are no specific implications in respect of Local Government Reorganisation.

Relevant Council Priority

6.2 The report supports the Council priority of sustainability.

6.3 The purpose of the Shareholders Committee is to fulfil all duties that are reserved to Redditch Borough Council as shareholder in Rubicon Leisure Limited. The Annual Report helps to demonstrate how the Committee is fulfilling this role as well as the Committee's conclusions in respect of the performance of Rubicon Leisure Limited.

Climate Change Implications

6.4 There are no specific climate change implications.

Executive Committee
202510th June

Equalities and Diversity Implications

6.5 There are no specific equalities and diversity implications.

7. RISK MANAGEMENT

7.1 There is a risk that if the Annual Report is not approved by the Executive Committee and referred to Council, Members will not have the assurance that Rubicon Leisure Limited is performing satisfactorily. In addition, Council will not receive confirmation as to whether the Shareholders Committee is performing its duties effectively.

8. APPENDICES and BACKGROUND PAPERS**Appendix**

Appendix 1 – Shareholders Committee Annual Report 2024/25

Background Papers

Committee Terms of Reference – Part 3 of the Council's Constitution.

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Redditch Borough Council
Shareholders Committee
Annual Report
2024 – 2025

TABLE OF CONTENTS

Chair's Foreword	3
Introduction	4
Membership	5
Review of the Shareholders Committee - May 2024	6
Members of the Committee	6
Meetings of the Committee in 2024/25	6
Informal Meetings of the Shareholders Committee with the Rubicon Board	7
Looking to the Future	8
Conclusion	8
Appendix 1: Governance Structure	9
Appendix 2: Expressions of Gratitude	10

Chair's Foreword

As Chair of the Shareholders Committee, I am pleased to be able to introduce this report which details the performance and impact of services which are managed under the Rubicon umbrella.

The Rubicon remit is wide ranging - from sports facilities at the Abbey Stadium and Pitcheroak Golf Course to heritage at our beautiful Forge Mill and culture at the Palace Theatre. These are prized and valued assets which we must be proud to support and uphold.

It is essential that Redditch Borough Council continues to invest in the physical infrastructure and scrutinises the financial details of Rubicon.

This is not simply about profitability and popularity, although we can see both of these rising. These assets are essential for residents, promoting health, wellbeing and a sense of pride in our town. We must ensure that we safeguard these for all of our futures.

There is still progress to make, but we can observe a clear upwards trajectory, of which we should be supportive and celebratory.

I would like to make a personal statement of gratitude towards all of the Rubicon staff - both paid and voluntary - who are contributing every day towards the success and viability of Rubicon.



**Councillor Sharon Harvey
Chair, Shareholders Committee
Redditch Borough Council**

Introduction

The annual report outlines the work undertaken by Redditch Borough Council's Shareholders Committee in the 2024 – 2025 municipal year. This is the first annual report to have been prepared on behalf of the Shareholders Committee, as this was a new requirement introduced at the Annual Council meeting in May 2024.

The Shareholders Committee is an integral part of the governance arrangements for the Council's company; Rubicon Leisure Limited, which was established in 2018. Rubicon Leisure Limited manages many of the Council's leisure and cultural assets on behalf of the authority, including the Abbey Stadium, the Arrow Valley Countryside Centre, Forge Mill Needle Museum and Pitcheroak Golf Course.

Currently, Rubicon Leisure Limited is the Council's only company. The role of the Shareholders Committee is distinct from the role of the Rubicon Board. The Rubicon Board, comprising Executive and Non-Executive Directors, is responsible for running the business and the proper delivery of services. There are officers at the Council responsible for managing the client side of the business, who monitor the service contract. The Shareholders Committee holds the Board to account and is responsible for a number of reserved matters, detailed in the articles of the company. A diagram relating to the governance structure for Rubicon Leisure Limited can be viewed at Appendix 1 to the report.

Matters reserved to the Shareholders Committee include:

- Approval of the company's annual Business Plan
- Approval of the appointment, remuneration and dismissal of the Managing Director of the company
- Approval of the appointment or dismissal of Directors on the Board
- Approval of above inflation pay increases and any other remuneration packages
- Approval of litigation defences or claims for the company
- Approval of the appointment of bankers and auditors for the company

The Shareholders Committee is a Sub-Committee of the Executive Committee. Any recommendations arising from meetings of the Shareholders Committee, that are not within the remit of the Committee to determine or do not relate to reserved matters, should be presented for the consideration of the Executive Committee.

Whilst a lot of the reports that are considered at meetings of this Committee contain exempt information, relating to the financial and business affairs of the company, the content of this report is public.

Membership

The Members of the Shareholders Committee are all Members of the Executive Committee. In 2024/25, the membership of the Committee was as follows:



**Councillor Sharon
Harvey (Chair)**



**Councillor Bill Hartnett
(Vice-Chair)**



**Councillor Joe
Baker (Until
April 2025)**



**Councillor Jen
Snape**



**Councillor Ian
Woodall**

Review of the Shareholders Committee – May 2024

In May 2024, the Committee terms of reference for the Shareholders Committee were reviewed. This review took place in a context in which the Shareholders Committee had been in existence for six years and it was felt to be appropriate to assess whether meetings were being conducted in accordance with best practice.

Following the review, Officers identified that the Shareholders Committee should ideally be a Sub-Committee of the Executive Committee, rather than of Council and should not form part of the political balance. Group Leaders were consulted and agreed that the Committee should be updated to become a sub-committee of the Executive Committee.

At the same time, the terms of reference for the Shareholders Committee were reviewed and updated. Amendments to the terms of reference included the introduction of a new requirement for the Shareholders Committee to prepare an Annual Report detailing the Committee's activities during the municipal year.

The changes to the structure and terms of reference for the Shareholders Committee were approved by Members at the Annual Council meeting held in May 2024.

Members of the Committee

As the Shareholders Committee is a Sub-Committee of the Executive Committee, all Members of the Committee must also be members of the Executive. The Executive Committee determined nominations to the Shareholders Committee at a meeting of the Executive Committee held in June 2025.

Whilst only Executive Committee members can be appointed to a sub-committee of the Executive, it has been recognised that the work of the Shareholders Committee will be of interest to all Members. Consequently, group leaders are invited to attend meetings of the Shareholders Committee to participate in the debate, although any group leader who is not also a member of the Shareholders Committee cannot take part in the vote. In addition, all Redditch Borough Councillors are entitled to attend meetings of the Committee to observe the proceedings, although they can only contribute to the debate at the discretion of the Chair.

Prior to the first meeting of the Shareholders Committee in the 2024/25 financial year, held in August 2024, training was provided to Members to help clarify their roles and responsibilities on this Committee.

Meetings of the Committee in 2024/25

Meetings of the Shareholders Committee were scheduled to take place in August, December, February and April.

At every meeting of the Committee, there were a number of standard items of business that were considered by Members. This included:

- Quarterly Performance Monitoring Reports, which detailed the performance of Rubicon Leisure Limited during the previous quarter of the Financial Year. These performance reports highlighted performance in relation to the range of services and activities provided by Rubicon Leisure Limited across the different leisure venues. Members welcomed positive feedback on improving performance, including in respect of increasing numbers of customers using services managed by the company.
- Quarterly Budget Monitoring Reports, which provided updates to Members on the financial performance of the company, including of specific venues managed by the company. These reports also highlighted any budget pressures as they emerged. The Committee welcomed the positive trajectory of the financial performance of the company compared to previous years.
- Updates on Council support to Rubicon Leisure Limited were provided for Members' consideration at every meeting of the Committee. As Rubicon Leisure Limited is a Council company, the authority continues to provide some support services to Rubicon Leisure Limited through Service Level Agreements (SLAs). The Council is also a source of finance, including capital finance, to the company to enable it to grow and expand its offering and information relating to this support was highlighted for the Committee's consideration.

In line with the reserved matters for the Committee, Members considered and approved the company's annual Business Plan in February 2025. This business plan, which detailed the targets and aspirations for the company in 2025/26, was presented at an earlier date in the municipal year for the Committee's consideration than in previous years.

An annual budget report, detailing the company's budgetary plans for 2025/26, was also considered and approved at the meeting of the Committee held in February 2025. Again, this report, which outlined key budget aspirations, targets and pressures, was presented for the Committee's consideration at an earlier stage than in previous years.

No recommendations were made by the Shareholders Committee to the Executive Committee in 2024/25.

Informal Meetings of the Shareholders Committee with Rubicon Board

In previous years, members of the Shareholders Committee have highlighted a desire to meet with members of the Rubicon Board. Whilst these meetings have no formal status and decisions could not be taken at these meetings, Members felt that they would be helpful in order to develop a better understanding of each other's roles, responsibilities and respective aspirations for Rubicon Leisure Limited.

There had been a few informal meetings between members of the Shareholders Committee and Rubicon Board held in previous years, although these had been organised on an ad hoc basis. In 2024/25, informal meetings were scheduled to

take place close to the dates of the Shareholders Committee meetings, which was welcomed by Members.

The Shareholders Committee would like to thank members of the Rubicon Board for taking the time to attend these informal meetings. It is hoped that these informal meetings will continue in future years.

Looking to the Future

The Shareholders Committee has received a lot of positive feedback regarding the performance and financial management of Rubicon Leisure Limited during the 2024/25 municipal year. However, the Committee is not complacent and recognises that there is a need for Members to keep scrutinising the work of the company and to hold the Board to account for decisions that are taken. At a time when local authority budgets are challenging, this prudence remains important and will continue in 2025/26.

This report has been produced in a context in which significant changes are anticipated to local government as part of imminent Local Government Reorganisation in two-tier authority areas such as Worcestershire. Whichever Unitary Authority model is introduced in Worcestershire, Rubicon Leisure Limited will not be the only Council company in the county to be impacted by these changes. Consideration will therefore need to be given to the governance structure(s) for local authority companies that will be implemented as part of the move to Unitary Authority status.

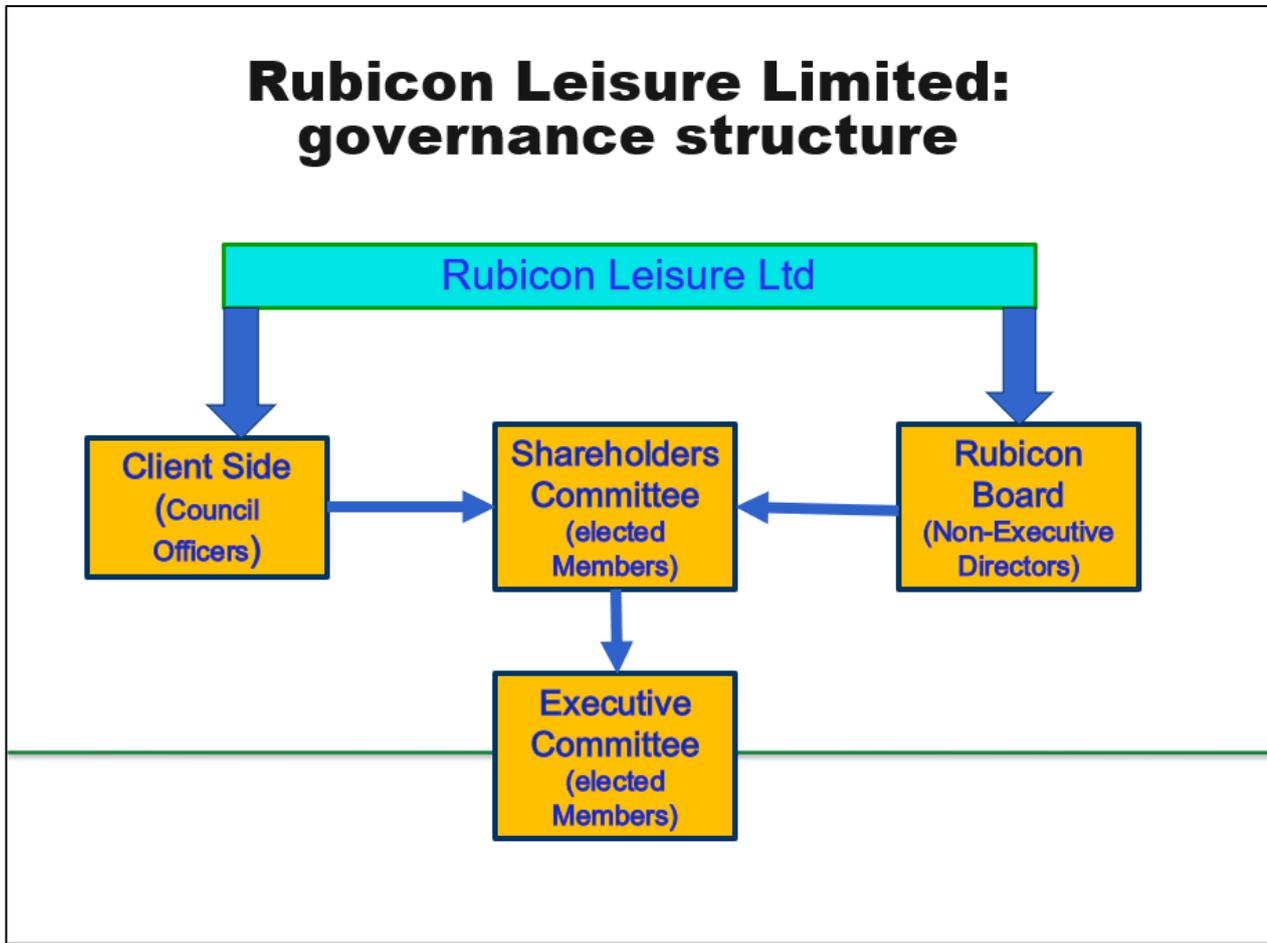
Conclusion

This is the first annual report from the Shareholders Committee, which has been produced during a year in which considerable changes have been made to the governance structure and operating arrangements for the Committee.

Members have welcomed positive updates on the performance of the services delivered by the company. The Committee is keen for this positive trajectory to continue, to the benefit of local residents who use the leisure and cultural services provided by Rubicon Leisure Limited.

However, there are challenges on the horizon and the Committee will need to remain mindful of these and to maintain vigilance in reviewing the work of the company to ensure that services continue to best meet the needs of customers.

Appendix 1 – Governance Structure



Appendix 2 – Expressions of Gratitude

The Shareholders Committee would like to thank all the members of the Rubicon Board for attending informal meetings with Committee members during the year.

The Shareholders Committee would also like to thank the following people who have either attended meetings or provided support in alternative ways to the Committee during the year:

- Peter Carpenter – Deputy Chief Executive and Section 151 Officer
- Ben Clawson-Chan – Managing Director, Rubicon Leisure Limited
- Nicola Cummings – Principal Solicitor – Governance
- Claire Felton – Assistant Director of Legal, Democratic and Procurement Services
- Claire Green – Principal Solicitor (Contracts, Commercial and Procurement)

Executive Committee
2025

10th June

Shareholders Committee – Appointment of Committee Members 2025/26

Relevant Portfolio Holder	Councillor Jane Spilsbury
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Claire Felton, Assistant Director of Legal, Democratic and Property Services
Report Author Jess Bayley-Hill	Job Title: Principal Democratic Services Officer Contact email: jess.bayley-hill@bromsgroveandredditch.gov.uk Contact Tel: (01527) 64252 Ext: 3072
Wards Affected	No specific ward relevance
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Sustainability
Non-Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	

1. RECOMMENDATIONS**The Executive Committee RESOLVE**

- 1) To nominate and agree five Members of the Executive Committee to appoint to sit on the Shareholders Committee during the 2025/26 municipal year;
- 2) To nominate and agree one of these five Members of the Executive Committee to be the Chair of the Shareholders Committee in the 2025/26 municipal year; and
- 3) To nominate and agree one of these five Members of the Executive Committee to be the Vice Chair of the Shareholders Committee in the 2025/26 municipal year.

2. BACKGROUND

- 2.1 The report invites the Executive Committee to appoint Members to serve on the Shareholders Committee, including Members to serve as Chair and Vice Chair of the Committee, in the 2025/26 municipal year.

3. OPERATIONAL ISSUES

- 3.1 The Shareholders Committee is a key part of the governance structure for the Council company, Rubicon Leisure Limited.

Executive Committee
202510th June

- 3.2 In line with national best practice, the Shareholders Committee has been established as a sub-committee of the Executive Committee.
- 3.3 As a sub-Committee of the Executive Committee, it is a responsibility of the Executive Committee, rather than Council, to appoint Members to serve on the Shareholders Committee.
- 3.4 Members appointed to the Shareholders Committee are strongly encouraged to attend training in respect of their roles and responsibilities on this Committee, particularly if they have not previously attended training on this subject.
- 3.5 It is important to note that the Councillor appointed as the Chair of the Shareholders Committee will be required to present an annual report to Council relating to the activities of Rubicon Leisure Limited at the end of the municipal year.
- 3.6 Whilst only Executive Committee members may be appointed to serve on the Shareholders Committee, the leader of the opposition political group represented on the Council will be invited to attend meetings of the Committee to participate in the debate, in line with requirements detailed in the Committee's terms of reference.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no specific financial implications arising in respect of this report.

5. LEGAL IMPLICATIONS

- 5.1 The Council is the only Shareholder in Rubicon Leisure Limited.
- 5.2 The powers of the Council as Shareholder are vested in the Executive Committee assisted by the Shareholders Committee.

6. OTHER - IMPLICATIONS**Local Government Reorganisation**

- 6.1 There are no specific implications for Local Government Reorganisation.

Relevant Council Priority

- 6.2 This report supports the Council's priority of sustainability.

Executive Committee
202510th June

- 6.3 The appointment of Members to the Shareholders Committee will help to ensure that meetings of the Committee can take place consistently during the year and address any matters reserved to the authority as shareholder.

Climate Change Implications

- 6.4 There are no specific climate change implications.

Equalities and Diversity Implications

- 6.5 There are no specific equalities and diversity implications.

7. RISK MANAGEMENT

- 7.1 The risk arising from not appointing Members to the Shareholders Committee is that the authority will not be able to fulfil its obligations as shareholder in Rubicon Leisure Limited. There is a risk that matters reserved to the shareholder could not then be addressed and this could undermine the sustainability of Rubicon Leisure Limited.

8. APPENDICES and BACKGROUND PAPERS**Background Papers**

Committee Terms of Reference in the Council's Constitution.

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Overview and Scrutiny Committee

Monday, 12th May, 2025

MINUTES

Present:

Councillor Matthew Dormer (Chair), Councillor Craig Warhurst (Vice-Chair) and Councillors William Boyd, Andrew Fry, Sachin Mathur, David Munro, Rita Rogers and Paul Wren

Also Present:

Councillor Sharon Harvey – Deputy Leader of the Council

Officers:

Guy Revans, Rachel Egan, Neil Batt and Mike Dunphy

Democratic Services Officers:

M Sliwinski

92. APOLOGIES AND NAMED SUBSTITUTES

Apologies for absence were received from Councillor Kane.

93. DECLARATIONS OF INTEREST AND OF PARTY WHIP

There were no declarations of interest nor of party whip.

94. MINUTES

The minutes of the Overview and Scrutiny Committee meeting held on 10th March 2025 were submitted for Members' consideration.

RESOLVED that

the Minutes of the Overview and Scrutiny Committee meeting held on 10th March 2025 be approved as a true and correct record and signed by the Chair.

95. PUBLIC SPEAKING

Chair

Overview and Scrutiny Committee

Monday, 12th May, 2025

There were no public speakers who had registered to speak at this meeting.

96. REDDITCH LOCAL PLAN - PRE-SCRUTINY

The report on Redditch Local Plan Issues and Options Consultation was presented. It was remarked that the Issues and Options Consultation would be the first stage in the development of the new Redditch Local Plan and, if endorsed by full Council, would be released for a six-week public consultation period. The Issues and Options Consultation followed the Local Development Scheme (LDS) which had set out the timeline for Local Plan development.

The purpose of the Issues and Options consultation was to consult the public, statutory consultees and a range of stakeholders on what the new Local Plan should contain. This consultation was less detailed than future consultations to be held through the plan-making process (such as a 'Preferred Option' consultation) and as such the Council had some discretion over the format of this consultation. It was commented that the consultation document at Appendix A was designed by officers so that it was concise and clear to understand but contained all the necessary information.

The Strategic Planning and Conservation Manager provided an overview of the sections contained within the Issues and Options consultation document. Sections 1-3 provided background information on the Borough and the Local Plan process, section 4 detailed the reasons why the Local Plan review was required and what the process would be for its development. Section 6 contained the details of the 'call for sites' exercise which enabled developers and landowners to submit potential development sites which they wished to be considered for inclusion in the Local Plan review.

Sections 7 and 9-15 contained consultation questions. Section 7 covered the design coding which defined requirements for the physical development of the area. The detailed design code would be produced later in the Local Plan period and would be informed by the responses from this Issues and Options consultation. Section 9 looked at the key issues identified for Redditch Borough based on evidence base documents such as the Sustainability Appraisal scoping report, the Housing and Economic Development Needs Assessment (HEDNA) and conversations held with elected members including through Planning Advisory Panel (PAP) meetings.

Overview and Scrutiny Committee

Monday, 12th May, 2025

Section 10 covered the possible growth options, looking at possible broad locations for development based on the characteristics of Redditch Borough. It was noted that the growth strategy would be informed by what sites were available for development, the suitability of potential sites submitted through the Call for Sites exercise and on what the evidence suggested were the locations most sustainable for new development. The government-set house building target would also need to be considered which for Redditch Borough was now 485 new houses per year.

It was highlighted that among the changes in the revised National Planning Policy Framework (NPPF) was the introduction of 'grey belt', defined as 'land in the Green Belt comprising previously developed land and/or any other land.' This had potential implications in that some land in Redditch, which was currently protected by the Green Belt or in countryside, could be considered for development.

The Strategic Planning and Conservation Manager reported that for this consultation, the Council would be using an online consultation platform called 'Commonplace', which allowed consultees to choose the sections of the consultation document they wished to fill out and which had features such as 'map pin' which would enable consultees to drop a pin in the digital map to provide location detail for any issued referred to in the responses.

It was commented that the use of a consultation platform should make it easier to engage with 'harder-to-reach' groups such as young people. Paper copies of the consultation document would also be available in the Council's temporary customer services centre, libraries and other locations throughout the Borough, and both email and paper responses to the consultation would also be accepted.

The following questions and comments were raised by Members during the discussion of this item:

- Grey Belt – It was clarified that the Grey Belt was defined as land within the Green Belt comprising previously developed land or as land located within the Green Belt that did not strongly contribute to the main purposes of the Green Belt designation. It was explained that at the moment it was uncertain how Grey Belt would need to be considered by planners. Within the Redditch's Issues and Options

Overview and Scrutiny Committee

Monday, 12th May, 2025

Consultation, developing on 'grey belt' was considered under option 2 in section 10.

- Assessment of suitable sites for the Gypsy, Traveller and Travelling Show-People Community – It was explained that this would be determined through this consultation process, including the assessment of need for this Community. A Member questioned the classification of travelling show-people under the above category. In response it was explained that classification of communities was determined based on legal definitions but this would also be reviewed based on feedback from these communities on how they identified themselves.
- Areas available for development within Redditch – A Member commented that there were opportunities to redevelop some areas within Redditch, such as Auxerre House or parts of Salters Lane. An example was cited of Auxerre House which was an extensive four-storey building that could be demolished and/or redeveloped to provide high quality urban housing. It was noted that the consultees would have the option to prioritise this type of 'urban renewal' development under option 1 of section 10 within the Issues and Options Consultation.
- Option for Members to attend meetings of the Planning Advisory Panel (PAP) remotely – The Officer confirmed he would find out whether remote attendance at future meetings of PAP could be accommodated (as hybrid meetings), or whether some meetings of PAP could be held entirely online.
- Actual numbers of houses built in Redditch versus central government annual house building targets – A Member requested information on the actual numbers of houses built in Redditch over the last few years and whether these numbers met central government targets for those years. The Strategic Planning and Conservation Manager undertook to provide Members with this data.
- Housing mix in the new Local Plan – A Member commented that building a greater proportion of higher council tax band housing would be beneficial in terms of council tax income; however, it was noted that from planning perspective council tax return was not a material consideration and could not be considered in the development of the Local Plan. Members also commented that housing mix needed to be the right type

Overview and Scrutiny Committee

Monday, 12th May, 2025

for Redditch demographic, including young people who were entering the housing market and elderly residents.

- Mix of sites for development – An observation was made that utilising a limited number of large sites would likely lead to slower rates of house building as opposed to choosing a number of sites spread across the Borough. It was commented that the expediting of house building would not necessarily be enforceable through the Local Plan but would require parliamentary legislation.
- It was highlighted that with the high house building targets there would need to be associated infrastructure and employment provided. It was noted that the employment numbers per area would be a metric set down by central government with the Council not having much option to adjust these figures.
- Promotion of the Issues and Options Consultation – The Strategic Planning and Conservation Manager stated that the consultation would be advertised in the local papers and through a social media campaign. The consultation platform, 'Commonplace', would enable officers to see live response rates by postcode area, and focus groups could be organised over and above this 6-week consultation period. It was noted that a further email would be sent to all Councillors before the consultation launch, containing a link to the consultation document. Councillors could forward this email to residents to encourage responses.
- Local Government Reorganisation (LGR) and the district/borough level Local Plans – A question was asked on the implications of LGR proposal to create unitary authorities in the existing two-tier local government areas and how this would impact the individual Local Plans created by the borough / district councils within the proposed unitary areas. It was responded that it was currently unknown how this issue would be resolved, for example if all plans would be amalgamated within a unitary local plan or whether existing local administrative geographies would continue to apply within the unitary area.
- Consideration of design costs and building regulations – It was noted by the officer that whether the Local Plan would require new builds to simply comply with the design and building regulations or enforce additional requirements above

Overview and Scrutiny Committee

Monday, 12th May, 2025

and beyond those regulations was not a straightforward issue to answer at the moment and would depend among other things on consultation responses received from within the building and design industry.

On being put to the vote, the recommendations as set out in the report were endorsed.

RECOMMENDED that

- 1) The Council endorses Redditch Local Plan Issues and Options consultation document (Appendix A) for a six-week public consultation period.**
- 2) Delegated authority is given to the Assistant Director for Planning, Leisure and Culture Services following consultation with the Portfolio Holder for Planning, Regeneration and Governance to make any minor technical corrections and editorial changes deemed necessary to aid the understanding of the documentation prior to final publishing.**

97. EXECUTIVE COMMITTEE MINUTES AND SCRUTINY OF THE EXECUTIVE COMMITTEE'S WORK PROGRAMME - SELECTING ITEMS FOR SCRUTINY

The following items from the latest Executive Work Programme (1st June to 30th September 2025) were added to the Overview and Scrutiny work programme (as pre-scrutiny items):

- Disposal of Housing Revenue Account Assets – 53 Parsons Road, Southcrest, Redditch. 53 Crabbs Cross Lane, Crabbs Cross, Redditch (9th June)
- Disposal of Housing Revenue Account Assets – Four garages at Ashorne Close, Matchborough, Redditch (9th June)
- Regulator of Social Housing Inspection Report and Housing Improvement Plan (1st September)

The above reports would be added to the items already selected for pre-scrutiny at the 9th June and 1st September meetings, as detailed in the Overview and Scrutiny Work Programme.

The Executive Director confirmed that the Regulator of Social Housing would release the inspection report on 20th July, and thus

Overview and Scrutiny Committee

Monday, 12th May, 2025

the Housing Improvement Plan and the Regulator's Inspection report would be considered at September Committee meetings.

RESOLVED that

The Overview and Scrutiny Work Programme be updated with items from the Executive Committee's Work Programme as per the pre-amble above.

98. OVERVIEW AND SCRUTINY WORK PROGRAMME

The Overview and Scrutiny Work Programme was presented for Members' consideration.

RESOLVED that

the Overview and Scrutiny Work Programme be updated with items from the latest Executive Work Programme, as agreed (at Minute No. 97).

99. TASK GROUPS, SHORT SHARP REVIEWS AND WORKING GROUPS - UPDATE REPORTS

Updates on the ongoing Task Groups and Working Groups were provided as follows:

- a) Budget Scrutiny Working Group – Chair, Councillor Warhurst

There were no further meetings of Budget Scrutiny since the last meeting of Overview and Scrutiny on 10th March.

- b) Performance Scrutiny Working Group – Chair, Councillor Warhurst

There were no further meetings of Performance Scrutiny since the last meeting of Overview and Scrutiny on 10th March.

- c) Fly Tipping and Bulky Waste Task Group – Chair, Councillor Dormer

It was confirmed that this Task Group had now been concluded and the final report would be submitted to the next meeting of Overview and Scrutiny.

- d) Post-16 Education Task Group – Chair, Councillor Warhurst

Overview and Scrutiny Committee

Monday, 12th May, 2025

Councillor Warhurst reported that a further meeting of the Task Group was necessary before recommendations could be made and the Task Group finalised.

RESOLVED that

the Task Groups, Short Sharp Reviews and Working Groups Update Reports be noted.

100. EXTERNAL SCRUTINY BODIES - UPDATE REPORTS

Update on the meetings of External Scrutiny Bodies were provided by the representatives as follows:

- a) West Midlands Combined Authority (WMCA) Overview and Scrutiny Committee – Council Representative, Councillor Kane

There was no update provided as Councillor Kane had submitted apologies.

- b) West Midlands Combined Authority (WMCA) Transport Delivery Overview and Scrutiny – Council Representative, Councillor Munro

Councillor Munro reported that the last meeting of WMCA Transport Delivery Overview and Scrutiny was held on 10th March 2025. At the meeting, Midland Rail Hub update was discussed, which had some details of relevance concerning the long-term delivery of rail services in Redditch.

Councillor Munro reported that redevelopment of the Birmingham Snow Hill station to add extra platforms would be a significant problem as the station was built below ground level. The Kings Norton to Barnt Green line would become 4-track, with electrification of fast lines and additional Kings Norton platforms. There were also plans to increase the volume of rail services going to and from Redditch station to Birmingham, however, it was highlighted that the business case for these Midland Rail Hub proposals would only be submitted in 2028.

With reference to the Redditch railway station, it was noted that before the covid pandemic there were three trains per hour operating from the station which had dropped to two services per hour following the covid pandemic.

Overview and Scrutiny Committee

Monday, 12th May, 2025

c) Worcestershire Health Overview and Scrutiny Committee (HOSC) – Council Representative, Council Munro

Councillor Munro reported that the last meeting of HOSC took place on 17th March 2025. At this meeting, the main item of relevance was the options for redesign of adult mental health rehabilitation services. All three options discussed at the meeting involved conversion of the now closed Hill Crest mental health unit to a level two rehabilitation unit, to provide local mental health rehabilitation services. Councillor Munro expressed hope that the unit would be truly local to Redditch residents, rather than a regional (i.e. all Worcestershire/Hertfordshire) centre for mental health rehabilitation services.

RESOLVED that

the External Scrutiny Bodies updates be noted.

101. EXCLUSION OF THE PUBLIC AND PRESS

It was agreed that exclusion of the public and press was not necessary in relation to Minute Item 102. DMIC (Digital Manufacturing and Innovation Centre) Additional Design Costs (AHR Architects Contract Variation) – Pre-Scrutiny, as the contents of the exempt appendix to the report would not be discussed in the meeting. The meeting remained in public session for its entire duration.

102. DMIC (DIGITAL MANUFACTURING AND INNOVATION CENTRE) ADDITIONAL DESIGN COSTS (AHR ARCHITECTS CONTRACT VARIATION) - PRE-SCRUTINY

The Regeneration Manager presented the report and provided background information to the report proposals. It was recapped that following a change in administration in 2024, decision had been taken by the Council to cancel the redevelopment of Redditch Library site, which initially left an underspend on the Town Investment Plan of £4.2 million.

In Autumn 2024, the Council's newly appointed regeneration team reviewed the business model for the Digital Manufacturing and Innovation Centre (DMIC) – one of the projects comprising the Town Investment Plan – and identified potential to expand the development and increase the project's financial viability by utilising the underspend from the cancelled library project.

Overview and Scrutiny Committee

Monday, 12th May, 2025

A decision was subsequently taken by the Town Deal Board to expand the development and increase the amount of net lettable floorspace in the DMIC. A Project Adjustment Request (PAR) was submitted and signed off by the Ministry of Housing, Communities and Local Government (MHCLG) to utilise the £4.2 million library underspend of which £3.937 million could be allocated to the DMIC project. It was noted that the Council's request for extended timescales for spending the Government's Town Deal funding had also been agreed by the MHCLG, which allowed the Council until the end of March 2027 to spend this funding.

It was explained that this report recommended the sign off of the additional design and project management costs associated with the expanded development, which would increase the amount of net lettable space and make the DCIM more sustainable with expanded benefits. The report asked for approval of allocating additional design cost up to a maximum of £1.45 million. It was clarified that this figure would include any contingency sums built into areas such as construction estimates. The report also asked for allocation of additional project management services costs up to a maximum of £250,000, including contingency costs.

It was explained that a further report would be brought forward for Members' consideration once designs were costed out and prior to appointment of a construction contractor. It was highlighted that all the funding utilised within the DMIC development was external funding, with no input from the Council's revenue or reserves.

Following officer presentation, a Member asked for detail regarding the increase in floor and net lettable space resulting from expanding the project. In response, it was stated that the expanded DMIC would be designed to have a gross floor area of 2600m² as opposed to 1900m² in the original project proposal. The net lettable space of the DCIM would also increase significantly as a result of expanding the development, to 17,000 ft².

In response to a question, it was explained that the maximum £1.45 million design team costs factored in possible contingency costs that could arise.

The Committee was reassured that the Towns Deal programme was on track to have all the MHCLG funding fully utilised by the deadline of March 2027. It was stated that there was no comparable deadline for the Council to spend the funding that was within the now defunct Greater Birmingham and Solihull Local Enterprise Funding (GBSLEP), in relation to the Council's funding

Overview and Scrutiny Committee

Monday, 12th May, 2025

within GBSLEP, it was explained that a bid would be submitted by June 2025 to recover this funding. It was reported by Officers that Solihull Metropolitan Borough Council (SMBC) had now recovered the funding it had in the GBSLEP funding 'pool' and Redditch Borough Council would be following a similar process to recover the funds that it had within GBSLEP.

In concluding this item, a Member commented on the impressive turnaround and positive prospects of the DMIC project.

On being put to the vote, the recommendations as set out in the report were endorsed.

RECOMMENDED to Executive Committee that:

- 1) **AHR Architects design team costs are increased up to a maximum of £1,450,000 for design of Redditch Digital Manufacturing and Innovation Centre (DMIC).**
- 2) **Costs for Gardiner and Theobald (G&T) project management services for the DMIC are increased up to a maximum of £250,000.**

RECOMMENDED that the Executive Committee NOTE:

- 3) **Any draw down of contingency is subject to approval by the Deputy Chief Executive (Section 151 Officer) in conjunction with the Assistant Director for Regeneration and Property.**
- 4) **That the additional funding at recommendations 1 and 2 above utilises reallocated central government grant monies.**

The Meeting commenced at 6.30 pm
and closed at 7.32 pm

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**Executive Committee
2025****10 June****Promoting Independent Living Service Contract Proposals**

Relevant Portfolio Holder	Councillor Bill Hartnett
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Judith Willis, Assistant Director of Community and Housing Services
Report Author - Matthew Bough	Job Title: Strategic Housing Services & Business Support Manager Contact email: matthew.bough@bromsgroveandredditch.gov.uk Contact Tel: 01527 64252 ext: 3120
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Community & Housing
Key Decision	
If you have any questions about this report, please contact the report author in advance of the meeting.	
This report contains exempt information as defined in Paragraph(s) 3 & 4 of Part I of Schedule 12A to the Local Government Act 1972, as amended	

1. RECOMMENDATIONS**The Executive Committee RESOLVE that:-**

- 1) The report be noted;**
- 2) Officers to work towards ensuring the continuation of the Promoting Independent Living Service.**

2. BACKGROUND

- 2.1 The Home Improvement Agency, known as Promoting Independent Living (PIL) service works closely with the other five Local Housing Authorities and Worcestershire County Council to provide a range of services including Disabled Facilities Grants (DFG) and discretionary grants for Home Repairs Assistance, Dementia Dwelling Grants, Minor Adaptations and Hospital Discharge Grants.
- 2.2 Since April 2020 the PIL service has been delivered by a private company Millbrook Healthcare.
- 2.3 The Council has a mandatory duty to provide Disabled Facilities Grants to eligible residents and may provide other discretionary assistance through its Housing Assistance Policy. Adaptations to Council housing

**Executive Committee
2025****10 June**

properties are delivered through the Housing Service not the PIL service.

- 2.4 Funding is received from the Government via the Better Care Fund (BCF), which is passported through to the Local Housing Authorities (LHA) from Worcestershire County Council annually.
- 2.5 In 2024 the six LHAs and Worcestershire County Council went out to procurement (as the current contract expired in March 2025) with a broadly similar specification, but reducing some of the wider asks of the contractor to make the service more cost effective. At the end of this process, a further year's contract extension was agreed with the existing provider.

3. OPERATIONAL ISSUES

- 3.1 Officers have considered options for the service following the end of the current contract in March 2026.
- 3.2 It is important to ensure that a PIL service continues to be made available to vulnerable residents.

4. FINANCIAL IMPLICATIONS

- 4.1 In 2025/26 the Council received £1,181,745 of BCF funding for the service, and it is expected to be at least this amount for 26/27.

5. LEGAL IMPLICATIONS

- 5.1 The Council has a statutory duty to provide mandatory DFGs and must have a Housing Assistance Policy in place to utilise the BCF funding flexibly.

6. OTHER - IMPLICATIONS**Local Government Reorganisation**

- 6.1 Any new authority or authorities will have a statutory duty to provide disabled facilities grants.

Relevant Council Priority

- 6.2 The PIL service supports the Council priority of Community & Housing to enable people to live safely and comfortably in a home that meets

**Executive Committee
2025****10 June**

their needs, through adaptations that help them to remain independent, healthy and well.

Climate Change Implications

- 6.3 The installation of more efficient equipment via DFG will reduce energy usage and provide higher levels of thermal comfort for dwellings benefitting from these measures thus reducing carbon emissions. The use of modern methods of construction will be considered for works where value for money can be demonstrated as well as carbon reduction.

Equalities and Diversity Implications

- 6.4 A previous Equality Impact Assessment was undertaken and has been reviewed and updated.

7. RISK MANAGEMENT

- 7.1 It will be critical to deliver this service whilst maintaining a high level of customer satisfaction. This risk will be managed through the specification and contract.

8. APPENDICES and BACKGROUND PAPERS

- 8.1 Appendix 1 contains confidential information.

**Executive Committee
2025****10 June**

9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Bill Hartnett, Portfolio Holder for Housing	23/05/2025
Lead Director / Assistant Director	Judith Willis, Assistant Director of Community and Housing Services	27/05/2025
Financial Services	Debra Goodall, Assistant Director of Finance and Customer Services	20/05/2025
Legal Services	Nicola Cummings, Principal Solicitor – Governance	20/05/2025

By virtue of paragraph(s) 3, 4 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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