



Executive Committee

Tue 9 Jun
2026
6.30 pm

Oakenshaw Community Centre,
Castleditch Lane, B98 7YB

If you have any queries on this Agenda please contact

Eve Davies
Democratic Services Officer

Town Hall, Walter Stranz Square, Redditch, B98 8AH
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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.

Agenda

Membership:

Cllrs:	Matthew Dormer (Chair)	Wanda King
	Brandon Clayton	Ashley Monk
	Gemma Monaco	Craig Warhurst (Vice-Chair)

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 / 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.

5. Shareholders Committee Annual Report 2025/26 (Pages 5 - 16)

6. Appointments to the Shareholders Committee 2026/27 (Pages 17 - 20)

7. Shared Homelessness Strategy 2026-2031

Report to follow.

8. Quarter 4 Performance Report (Pages 21 - 32)

9. Enforcement and Civil Penalties Notices Policy (Pages 33 - 122)

10. Economic Development and Regeneration Service Delivery (Pages 123 - 130)

11. Housing Tenant Engagement Policy

Report to follow

12. Annual Housing Complaints Performance and Service Improvement Report (Pages 131 - 198)

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13. Quarter 4 2025/2026 Housing Performance incorporating Tenant Satisfaction Measures Results (Pages 199 - 214)

14. Q4 Update and 2026/27 Housing Improvement Plan

Report to follow.

15. 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 1 – any individual;
- Para 2 – the identity of any individual;
- Para 3 – financial or business affairs;
- Para 4 – labour relations matters;
- Para 5 – legal professional privilege;
- Para 6 – a notice, order or direction;
- Para 7 – the prevention, investigation or prosecution of crime;
and may need to be considered as ‘exempt’.

16. Construction of Redditch Innovation Centre (Pages 215 - 226)

17. Minutes (Pages 227 - 242)

18. To consider any urgent business, details of which have been notified to the Assistant Director 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

Redditch Borough Council Shareholders Committee Annual Report 2025 - 2026



Chair's Foreword

As Leader of Redditch Borough Council and Chair of the Rubicon Shareholders Committee I am pleased to be able to present this annual report.

Rubicon is a key asset for our Council, delivering many of our commitments to leisure and recreation in the Borough.

We have seen Rubicon grow and develop commercially, with increasing numbers of customers using these services.

The positive trajectory is testament to the commitment of the Rubicon Leisure Limited Board, supported by a wealth of professional staff and a host of dedicated volunteers as well as Council officers.

Moving closer to Local Government Reorganisation our intention is for Rubicon to continue as a highly effective organisation. Rubicon should be considered as an exemplar which will continue to deliver leisure services for many years to come.

The Shareholders Committee forms an essential layer of governance in the Rubicon model. Accountability and transparency are essential parts of our ethos, and we are proud of the robust oversight we have provided in terms of financial reports and the aspirational business plan for 2026/2027.

I would like to thank my colleagues who have served on the Committee this year alongside me: Councillors Ian Woodall, Juliet Barker Smith, Bill Hartnett and Jane Spilsbury.

I commend this Annual Report to Council.



**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 2025 – 2026 municipal year. This is the second 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 2025/26, the membership of the Committee was as follows:



**Councillor Sharon
Harvey (Chair)**



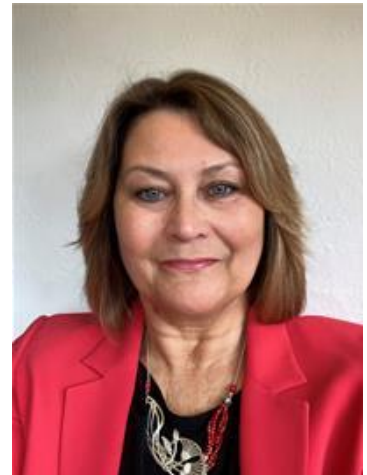
**Councillor Ian Woodall
(Vice-Chair)**



**Councillor
Juliet Barker
Smith**



**Councillor Bill
Hartnett**



**Councillor
Jane Spilsbury**

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.

Meetings of the Committee in 2025/26

Meetings of the Shareholders Committee were scheduled to take place in August, December, February and April. The February meeting was postponed, following consultation with the Chair, and was rescheduled to take place in March 2026.

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.



Figure 1: Forge Mill Needle Museum, 1940s Day (May 2025) – The Violettes

- 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.

The Committee was particularly pleased to learn about progress during the year at a number of venues managed by Rubicon Leisure Limited, although the Committee was proud of and grateful for the hard work of staff and volunteers at all of these venues.

Forge Mill Needle Museum has held a number of exciting events during the year that were well attended and the Committee welcomed the growth in visitor numbers. The Committee recognised that the new food and beverage offer at the museum had also attracted new visitors and Members expressed hopes that this positive trajectory would continue in 2026/27.

The Boathouse at the Arrow Valley Countryside Centre was also welcomed by the Committee and Members felt that this had positively enhanced the experience of visitors to the Arrow Valley Country Park. Members also welcomed news that the Boathouse was shortlisted in the New Tourism Business of the Year Category in the Visit Worcestershire Awards 2025/26.

In addition, the Committee was pleased to note the positive contribution that venues and facilities provided by Rubicon Leisure Limited contributed to the health and wellbeing of residents living in the Borough. In particular, fitness and swimming opportunities at the Abbey Stadium were identified as making a positive contribution to the health and wellbeing of local residents.



Figure 2: The Boathouse, Arrow Valley Visitor Centre

In line with the reserved matters for the Committee, Members considered and approved the company's annual Business Plan in March 2026. This business plan details the targets and aspirations for the company in 2026/27.

An annual budget report, detailing the company's budgetary plans for 2026/27, was also considered and approved at the meeting of the Committee held in March 2026.

No recommendations were made by the Shareholders Committee to the Executive Committee in 2025/26.



Figure 3: Fitness equipment in use at the Abbey Stadium

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.

In 2025/26, informal meetings were arranged 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 2025/26 municipal year. However, the Committee recognises that it is important to continue to monitor the work of the company closely to ensure that best value is achieved in the deliver of leisure services within the Borough.

The last Annual Report from the Shareholders Committee was published at the start of the Local Government Reorganisation process and this has continued to progress in Worcestershire in 2025/26. There have been two submissions made to the Government in respect of Local Government Reorganisation. 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 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.



Figure 4: Sounds in the Grounds, Arrow Valley Visitor Centre, August 2025.

Conclusion

This is the second 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.

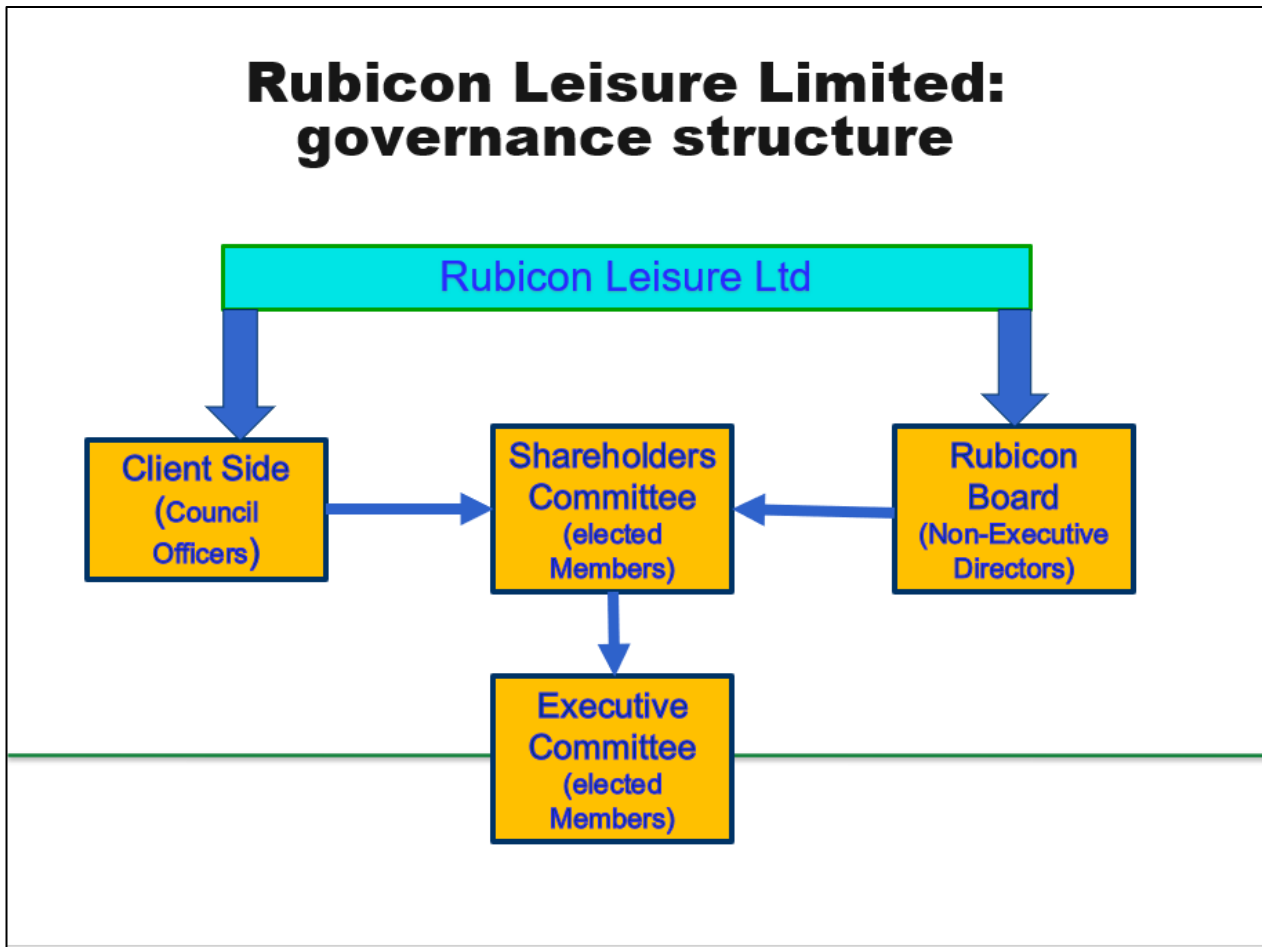
Members have welcomed positive updates on the performance of the services delivered by the company. The Committee is keen for this positive trajectory to continue, to the benefit of local residents who use the leisure and cultural services provided by Rubicon Leisure Limited.

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.



Figure 5: The Redditch Pantomime, Aladdin, at the Palace Theatre, 2025/26.

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:

- Ruth Bamford, Assistant Director of Planning, Leisure and Culture Services
- Sarah Casserley, Head of Marketing and Events, Rubicon Leisure Limited
- Ben Clawson-Chan, Managing Director, Rubicon Leisure Limited
- Debra Goodall, Assistant Director of Finance and Customer Services
- Julie Lorraine, Interim Director of Finance

The Committee would like to thank all the staff and volunteers who work for Rubicon Leisure Limited and recognises the importance of their hard work to the ongoing provision of services by the company that meet the needs of local communities.

All images in this report have been provided courtesy of Rubicon Leisure Limited. The Shareholders Committee would like to thank the company for providing these images for inclusion in the report.

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Appointments to the Shareholders Committee 2026/27

Relevant Portfolio Holder	Councillor Matthew Dormer
Portfolio Holder Consulted	Yes
Relevant Assistant Director	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 Tel: 01527 64252
Wards Affected	(All Wards);
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Supported Governance;
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 RESOLVE:-**

- 1) To nominate and agree five Members of the Executive Committee to appoint to sit on the Shareholders Committee during the 2026/27 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 2026/27 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 2026/27 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

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

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- 6.2 This report supports the Council's priority of supported governance.
- 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 climate change implications

Community Impact Implications

- 6.5 Whilst Rubicon Leisure Limited can make a positive contribution to community health and wellbeing, through provision of activities, the appointment of Councillors to serve on the Shareholders Committee does not have any specific health and wellbeing implications.
- 6.6 There are no community safety implications.

Equalities and Diversity Implications

- 6.7 There are no 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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Quarter 4 2025/26 Performance Report

Relevant Portfolio Holder	Councillor Craig Warhurst
Portfolio Holder Consulted	
Relevant Assistant Director	Hannah Corredor, Assistant Director for Corporate Services and Transformation
Report Author: Sarah Davis	Job Title: Performance and Improvement Advisor Contact email: sarah.davis@bromsgroveandredditch.gov.uk Tel: 01527 534145
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	All
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: -****The overview of Quarter 4 performance for the period January to March 2026 against the Council Plan priorities, as detailed in Appendix 1 be noted.****2. BACKGROUND**

- 2.1 There are a set of corporate measures which are organised by the priorities set out in the Redditch Borough Council Plan 2025–2028. The summary table for quarterly performance can be found in Appendix 1.
- 2.2 The corporate measures are structured under the Council Plan priorities:
- Economy, Regeneration & Prosperity
 - Community & Housing
 - Green, Clean & Safe
 - Organisational Priorities
- 2.3 Appendix 1 includes the current quarter's data compared to previous quarters (where available) to support trend analysis.

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2.4 The Council is looking at further alignment with Council Plan and Service Business Planning reporting, strengthening transparency, improving accessibility and strategic alignment. This continues to be undertaken as the Council works on developing a new style of quarterly performance reporting, as measures are aligned and refined to the Redditch Borough Council Plan 2025-2028.

2.5 The Council Plan confirms that progress will be monitored quarterly (where data is available) and reported through the Executive Committee and scrutiny arrangements. This report supports that approach, within the summary view of quarterly corporate performance in Appendix 1.

3. OPERATIONAL ISSUES

3.1 Quarterly performance reporting supports services to understand delivery against the Council Plan priorities and enables timely identification of emerging pressures, supporting responsive service management and informed Member oversight.

3.2 Officers intend to monitor progress with the implementation of agreed Motions on Notice in the future. This monitoring will commence from Quarter 1 of the 2026/27 municipal year onwards

4. FINANCIAL IMPLICATIONS

4.1 Finance and performance reporting will continue to be aligned, with this report sitting alongside the quarterly financial reports.

4.2 Where performance pressures are identified in demand led services, these are monitored alongside budget forecasts to ensure emerging financial impacts are understood early and reflected in financial planning.

5. LEGAL IMPLICATIONS

5.1 There are no legal implications arising directly from this report.

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

6.1 There are no direct implications arising from this report in relation to Local Government Reorganisation or Devolution. The performance reporting arrangements outlined in this report support the Council's ongoing governance and assurance frameworks and provide continuity in monitoring delivery against current Council Plan priorities.

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Delivery of Council Plan

- 6.2 An assessment of performance for the last quarter offering insight into progress, stability, and challenges across each priority area, informing assurance on delivery against the Council Plan.

Economy, Regeneration & Prosperity:

- 6.2.1 The cumulative nature of grant funding resulted in the total spend reaching the target of 66% at the end of Quarter 4.
- 6.2.2 Members are asked to note that the external funding spend deadline has been extended to September 2026 by the UK Government, enabling Innovation Lighthouse Programme (Programme is aimed at boosting growth, competitiveness and resilience in the local manufacturing sector) participants to complete the support element before applying for grant funding to deliver their project.

Community & Housing:

- 6.2.3 Planning and building control performance has remained consistently strong, with major applications being determined reaching 100%, and minor applications at 86% and remaining above target, despite a slight dip and building control returning to 100% in Quarter 4.
- 6.2.4 Housing pressures have shown improvement, with the number of households in temporary accommodation reducing steadily to (25) in Quarter 4, with the majority housed in dispersed units (properties designated for use for homelessness).
- 6.2.5 Homeless preventions increased slightly in Quarter 3 before reducing again in Quarter 4, which is reflected in 73.1% of prevention duties ending due to households securing accommodation, demonstrating improved outcomes for cases that concluded.
- 6.2.6 Void turnaround times improved in Quarter 4, returning to target following earlier seasonal pressures, with the associated increase in void rent loss reflecting the continued focus on progressing properties back into use.

Green, Clean & Safe:

- 6.2.7 During 2025/26 the Council collected 167 fewer tonnes of household waste across all streams compared to the previous year. Redditch achieved below the national average for the proportion of household

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waste recycled or composted in 2025/26 but saw increased performance compared to 2024/25.

- 6.2.8 The main reason for the variance from the national average is the small scale of the authority's garden waste service, which is considerably smaller than many other local authorities, although is growing slowly.
- 6.2.9 Operational activity has remained broadly stable throughout the year with fly tipping volumes and removal times consistently better than target (5 days).
- 6.2.10 Enforcement activity includes a range of actions including Fixed Penalty Notices (FPNs). While FPNs have reduced this period, more complex and time-intensive investigations such as large-scale fly tipping have increased where FPNs are not always the appropriate outcome, reflecting a shift in activity rather than an overall reduction.
- 6.2.11 Households supported by the energy advice service have reduced with commentary attributing this mainly to external factors (milder winter, lower bills/cap). Members are asked to note that demand could rise again due to international factors.
- 6.2.12 A Green Flag Award (International accreditation recognised as a national benchmark for publicly accessible parks and green spaces) has been applied for, and the Council is currently getting re-assessed for Morton Stanley and Overdale park in Redditch. Officers anticipate that these sites will be successful for a Green Flag award, and the Council will maintain a 75% completion in 2026/27.

Organisational Priorities:

- 6.2.13 Core responsiveness of the Council remained strong, with 100% of media enquiries responded to within agreed timescales in every quarter.
- 6.2.14 Council Tax and Business collection rates as expected improved progressively through the year, with Council Tax rising to 96% and Business Rates rising to 94% by Quarter 4.
- 6.2.15 Customer and assurance performance was mixed: average complaint response times improved to five days by Quarter 4, with complaint volumes remaining low at 26 for the quarter. Four complaints exceeded the 10-day standard, resulting in performance remaining below the 95% target for most of the year, despite a stronger year-end position of 85%. Data excludes housing-related and Housing Ombudsman complaints.

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- 6.2.16 Workforce indicator (staff turnover rates) was mixed across Quarter 1–Quarter 3, with turnover rising in Quarter 3 after improvement in Quarter 2. Data for Quarter 4 was not available at the time of reporting because of payroll dates.

Climate Change Implications

- 6.3 There are no direct climate change implications arising from this report. However, the performance information includes measures that support delivery of the Council Plan 2025–28, within the Green, Clean & Safe Redditch priority. This includes monitoring progress against objectives relating to energy efficiency and carbon reduction, waste and recycling, environmental enforcement, biodiversity, and sustainable transport. Performance reporting therefore plays an important role in tracking progress and supporting continuous improvement against the Council's environmental and climate-related ambitions set out in the Council Plan.

Equalities and Diversity Implications

- 6.4 There are no equality and diversity implications arising directly from this report.

7. RISK MANAGEMENT

- 7.1 Monitoring performance regularly will assist the Council in effective identification and management of risks. It will also support the management of risks identified around robust decision making and the accuracy/effectiveness of performance data.

8. APPENDICES and BACKGROUND PAPERS

Appendix 1: Quarter 4 Performance Table 2025/26 provides detailed quarterly performance data to support trend analysis and deeper scrutiny where required.

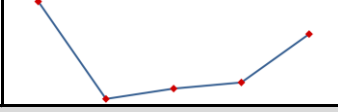

REDDITCH BOROUGH COUNCIL**Executive
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9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Jane Spilsbury, Deputy Leader of the Council and Portfolio Holder for Performance, Engagement and Governance	13/05/2026
Assistant Director	Hannah Corredor, Assistant Director for Corporate Services and Transformation	13/05/2026
Financial Services	Debra Goodall, Assistant Director for Finance and Customer Services	
Legal and Democratic Services	Nicola Cummings, Principal Solicitor – Governance Jess Bayley-Hill, Principal Democratic Services Officer	18/05/26
Performance and Improvement Team (if equalities implications apply)	Sarah Davis, Improvement Advisor	Author
Climate Change Team (if climate change implications apply)	Judith Willis, Assistant Director for Community and Housing Services	

Economy, Regeneration & Prosperity

Measure name	Type	Q4 24/25	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Target	Aim	Trend
Grant funding paid to businesses	£	£115,645.43	£0	£12,426.32	£19,568.00	£76,831.00	£76,831.00	⬆️	
This shows the total grant paid in 2025/26 (with spending extended to 30 September 2026), comprising four start-up grants to manufacturing, health and education businesses, and seven growth grants across wholesale, financial, business, machinery hire, technical and other services.									
Business grant funding- % spent	%	69.7%	0%	10.6%	17%	66%	66%	⬆️	
Reflecting the cumulative grant funding, total spend reached 66% by Q4, supported by the UK Government's extension of the external funding deadline to September 2026 to allow Innovation Lighthouse Programme participants to complete support before applying for delivery funding.									

Green, Clean & Safe


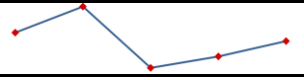
Measure name	Type	Q4 24/25	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Target	Aim	Trend
% household waste recycled or composted	%	33.2%	30.2%	35.9%	33%	33.2%	44%	↕	
In 2025/26, a year on year reduction of 167 tonnes in household waste collected, with Redditch recycled or composted a lower proportion of household waste than the national average but improved on 2024/25 performance, reflecting the relatively small (though growing) garden waste service.									
# flytips	#	473	503	475	370	513	650	↘	
Average time taken to remove fly-tipping reported	# days	2.7	3.7	3	2.5	3	5	↘	
# active environmental enforcement cases	#		82	84	10	53			
# environmental enforcement fixed penalty notices	#	5	2	4	2	1			
No. of households supported by energy advice service (AoE)	#	349	282	196	184	163		↕	
The drop in calls from Q3 to Q4 likely reflects reduced household pressure from milder weather and lower energy costs, although international factors may drive increased demand in future.									
% of green flags awarded	%	25	50	50	50	50	75	↕	
Green Flag status (international recognised benchmark for publicly accessible parks and green spaces) has been applied for Morton Stanley and Overdale Park in Redditch, with successful awards anticipated and 75% Green Flag coverage expected to be maintained in 2026/27.									
# crimes recorded (excluding ASB)	#	1,538	1,707	1,572	1,575	1,635		↘	
ASB	#	268	370	344	289	254		↘	

**there is a lag with this data as it is obtained using verified figures from Police.uk*

Community & Housing

Measure name	Type	Q4 24/25	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Target	Aim	Trend
% of major planning applications determined within 13 weeks (or agreed ext)	%	88.9%	90%	90%	89%	100%	60%	⬆️	
% of minor planning applications determined within 8 weeks (or agreed ext)	%	89.8%	89.8%	91.3%	90%	86%	70%	⬆️	
No. of planning enforcement actions taken- cases opened	#	12	14	16	9	9			
No. of planning enforcement actions taken- cases closed	#	7	14	21	15	2			
% of Building Control applications determined within 5 weeks (or 8 weeks on agreement)	%	100%	100%	96%	95%	100%	85%	⬆️	
Number threatened with homelessness preventions	#	23	15	17	27	19			
Prevention duties ended in Q4 as accommodation was secured.									
# households in temporary accommodation- snapshot	#	54	47	38	41	25		⬇️	
Of the 25 households in temporary accommodation, 22 are placed in dispersed units (properties designated for use for homelessness).									
% of households in temporary accommodation- + 6 weeks	%	7%	4%	0%	0%	0%	0%	⬇️	
Void turnaround time	# days	21.7	24.7	32	30	22	22	⬇️	

The overall void turnaround time was 22 days, while standard voids averaged 33.8 days due to a seasonal increase linked to Christmas contract closures during the quarter.

Void rent loss	£	61,921.34	75,674.94	43,134.37	49,180.16	57,319.34			
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Organisational Priorities

Measure name	Type	Q4 24/25	Q1 25/26	Q2 25/26	Q3 25/26	Q4 25/26	Target	Aim	Trend
% of media enquiries responded to within agreed timescales	%	100%	100%	100%	100%	100%	100%	⬆️	
Council Tax Collection Rate	%	96.46%	27.99%	55.36%	82.52%	96%	82.51%	⬆️	
Business Rates Collection Rate	%	96.38%	25.29%	51.53%	77%	94%	80.29%	⬆️	
HB: Speed of processing new claims	# days	13.7	15.3	13.7	15	11	20	⬇️	
HB: Speed of processing change of circumstances	# days	4	7.7	6.7	6	5	8	⬇️	
HB: Local Authority error rate	%	0.09%	0.04%	0.09%	0%	0.12%	0.48%	⬇️	
# complaints received*	#	17	11	33	18	26			
Average working days to respond to complaints*	# days	16.6	18.2	4.7	9	5	10	⬇️	
% complaints answered within agreed timescales*	%	68.8%	75%	87%	81%	85%	95%	⬆️	
Complaint volumes were low at 26 for the quarter. Four complaints exceeded the 10-day standard, leading to missing the 95% target. Data excludes housing-related and Housing Ombudsman complaints.									
Staff turnover rates	%	9.8%	10.2%	9.2%	10.2%	No data	13.4%	⬇️	
Sickness absence - long term	# days per FTE	6.4	2.88	3.19	3	2	7.8	⬇️	

Executive Committee
20269th June**Private Sector Housing Enforcement & Civil Penalty Notice Policy**

Relevant Portfolio Holder	Councillor Bill Hartnett
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Assistant Director Community and Housing Services
Report Author Katie Sharp-Fisher	Job Title: Private Sector Housing Manager Contact email:k.sharp-fisher@bromsgroveandredditch.gov.uk Contact Tel: 01527 881437
Wards Affected	ALL
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Community and 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 Private Sector Housing Enforcement and Civil Penalty Policy (Appendix 1) be approved and delegated authority be granted to the Assistant Director Community & Housing Services, following consultation with the Portfolio Holder for Housing, to update the Policy in line with any legislative or government guidance updates.**

The Executive Committee is asked to RECOMMEND that: -

- 2) **The Scheme of Delegations be amended to incorporate: -**
 - a. **Enforcement powers under the Renters Rights Act 2025 in accordance with the wording set out in Appendix 2**
 - b. **Enforcement powers under the Electrical Safety Standards in the Private Sector (England) Regulations 2020 and under Section 126 and Schedule 9 of the Housing and Planning Act 2016 as set out in Appendix 3.**

2. BACKGROUND

- 2.1 This report follows on from the previous report to Executive regarding the Renters Rights Act dated the 17th March 2026. The Private Sector Housing Enforcement and Civil Penalty Notice Policy has been reviewed and re-written in response to the Renters Rights Act 2025, which received Royal Assent on the 27th October 2025, with Phase 1 commencing on the 1st May 2026. This represents a significant update

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to the Council's enforcement framework in response to the expanded statutory duties and regulatory burdens introduced by the Renters' Rights Act 2025.

- 2.2 The revised Enforcement and Civil Penalty Notice Policy ("the policy") incorporates new enforcement duties arising from the Renters Rights Act 2025. It does not however alter the Council's overarching approach to how and when the Council decides to take enforcement action. It clarifies and strengthens how existing and statutory powers will be exercised ensuring that enforcement activity remains: -
- Proportionate
 - Evidence-based
 - Risk-led
 - Consistent with the Regulators Code
- 2.3 The Policy provides a consistent framework for the Council's enforcement functions across a wide range of housing and associated legislation, including primary housing statutes, landlord and tenant law, environmental protection and relevant regulatory regimes such as: -
- Housing Act 2004
 - Protection from Eviction Act 1977
 - Renters Rights Act 2025
 - Energy Efficiency (Private Rented Property)(England and Wales) Regulations 2015
 - Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- 2.4 The Policy aligns with national best practice, including the Association of Chief Environmental Health Officers (ACEHO) model enforcement and Civil Penalty policy, and establishes a clear, consistent and legally robust framework for enforcement decision making and the application civil penalties.
- 2.5 Approval of the Policy ensures the Council can lawfully and effectively discharge its regulatory responsibilities. Failure to adopt the updated policy would result in: -
- A lack of alignment with new statutory duties
 - Increased risk of inconsistent or unlawful enforcement
 - Reduced ability to respond to emerging risks in the private rented sector
 - Increased exposure to legal challenge
- 2.6 This Policy applies to all private sector housing-related enforcement functions exercised by the Council, including private rented housing, owner-occupied housing, empty homes, Houses in Multiple Occupation

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and relevant site-based accommodation, where statutory powers apply. The Policy does not relate to Redditch Borough Council owned housing stock.

- 2.7 The Policy recognises that most landlords operate responsibly and therefore prioritises advice, engagement and support where appropriate. Formal enforcement is targeted at landlords and managing agents who fail to comply with their legal obligations, ensuring a fair and proportionate regulatory approach.
- 2.8 The Policy establishes a clear framework for decision making, ensuring that enforcement action is based on consistent assessment of risk, harm, vulnerability and evidence. This supports transparency and ensures that cases are progressed in a structured manner.
- 2.9 The policy makes clear that civil financial penalties are not fixed or automatic and must be assessed on a case by case basis. In determining the level of any penalty, officers have regard to statutory guidance, the seriousness of the breach, culpability, harm caused, any aggravating or mitigating factors, and the need for proportionality. Maximum penalties will be reserved for the most serious or deliberate cases of non-compliance.

3. Key Policy Changes

- 3.1 The Policy reflects the Council's expanded enforcement responsibilities under the Renters Rights Act 2025 and associated housing legislation. It sets out the Council's approach to enforcing statutory requirements relating to, among other matters: -
- misuse of possession grounds
 - unlawful rent practices, including rent bidding
 - failure to provide prescribed tenancy information
 - discriminatory letting practices
 - compliance with the Private Rented Sector Database (when in force)
- 3.2 The Policy adopts the enforcement principles and formalises decision making through: -
- defined investigation thresholds
 - evidential and public interest tests
 - proportionality assessments
 - clear case closure criteria
- 3.3 It establishes a more robust and intelligence-led approach to enforcement enabling the Council to address serious and systematic non-compliance including: -

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-
- Portfolio-wide investigations of landlords where systemic non-compliance is identified
 - Targeted enforcement based on harm, vulnerability and risk
 - Co-ordinated action across multiple properties where landlords or agents demonstrate repeated non-compliance.
- 3.4 The Policy confirms that civil penalty income is ringfenced and it must be reinvested into private sector housing enforcement in accordance with statutory requirements and internal financial governance arrangements. This supports the long term sustainability of the service and potentially reduces the reliance on core Council funding.
- 3.5 The policy provides clarity for residents, landlords and managing agents and partners organisations by confirming that: -
- the Council acts as a statutory regulator, not an arbitrator of private contractual disputes
 - enforcement action is undertaken only where statutory breaches are identified
 - resources are focused on matters that pose the greatest risk of harm
- 3.6 The implementation of this policy is expected to contribute to improve housing conditions, reduced health risks and increased tenancy security and within the Borough.

4. OPERATIONAL ISSUES

- 4.1 The Renters Rights Act 2025 significantly expands the Council's regulatory responsibilities, introducing new enforcement duties relating to landlord conduct and tenancy compliance alongside existing Housing Act 2004 duties. The policy complements existing duties in relation to the Housing Health and Safety Rating System (HHSRS), including mandatory action where Category 1 hazards are identified and discretionary action for Category 2 hazards.
- 4.2 The Council anticipates an increase in enforcement activity arising from the use of civil financial penalties. The effective use of civil financial penalties requires a high evidential threshold. Officers must ensure that cases meet the relevant legal tests, including sufficient evidence and public interest considerations, and that all enforcement action is supported by clear and auditable evidence. This includes a higher volume of cases requiring formal investigation, evidence gathering and decision-making to the required legal standard, particularly where penalties must be justified and capable of being defended at appeal.

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- 4.3 There is an increased risk of appeals to the First-tier Tribunal where civil penalties are imposed. This requires that all notices, calculations and decision-making processes are legally robust, proportionate and clearly documented to withstand external scrutiny.
- 4.4 The policy establishes a structured and consistent approach to determining civil penalty levels. This requires officers to assess each case individually, taking into account factors including culpability, harm, aggravating and mitigating circumstances, and the need for proportionality. This approach ensures fairness but increases the time and complexity associated with decision-making.
- 4.5 The implementation of the policy requires effective case management systems to support the administration of enforcement action, including the preparation of notices of intent, final notices, representations, and appeals. Accurate record keeping is essential to ensure transparency and consistency.
- 4.6 The recovery of civil financial penalties presents an operational challenge. Payment is not guaranteed and may require additional enforcement action, including debt recovery processes and legal intervention. This introduces additional administrative and financial considerations for the Council.
- 4.7 The policy requires officers to exercise discretion in determining when to pursue civil penalties as opposed to alternative enforcement options. This necessitates consistent decision-making across the service to ensure that enforcement action is proportionate, targeted and aligned with the Council's wider regulatory objectives.

Implications for the Scheme of Delegations

- 4.9 As noted at paragraph 3.1 above, under the Renters Rights Act 2025 the scope of the Council's enforcement powers has been expanded. To ensure that officers are able to utilise these powers it will be necessary for some additional delegations to be added to the Officer Scheme of Delegations. Members are referred to the wording at Appendix 2 which sets out the additional delegations sought.
- 4.10 In preparing the new enforcement policy it has come to officers attention that delegations already granted by Members following two previous reports on private sector housing enforcement need to be formally added into the Scheme of Delegations. These relate to the following reports: -
- Electrical Safety Standards in the Private Rented Sector – Executive 7th September 2021

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- Introduction of Civil Penalties for Failure to comply with standards in the private rented sector – Executive 11th June 2019

4.11 In summary the first report related to measures granted to local authorities to bring enforcement action against landlords regarding electrical safety standards. The second report brought into effect the option under Schedule 9 of the Housing Act 2004 that when bringing enforcement action for certain specific breaches of that act the Council can impose a financial penalty as an alternative to bringing a prosecution. Members are asked to note that these are not new delegations and this is simply a tidying up exercise to ensure that all the relevant powers available to the officers are properly recorded in the Scheme of Delegations. For ease of reference, the specific wording that will be added to cover these provisions is set out in Appendix 3.

5. FINANCIAL IMPLICATIONS

- 5.1 The implementation of the Renters Rights Act 2025 and the associated Enforcement and Civil Penalty Notice Policy introduces additional financial demands on the Council. These relate primarily to increased enforcement activity, including investigation, case management, legal support, and the administration of civil financial penalties.
- 5.2 New Burdens Funding of £60,000 has been allocated to the Council by Central Government in recognition of the additional duties and responsibilities arising from implementation of the Renters Rights Act 2025. This includes increased activity relating to enforcement of tenancy reforms, illegal eviction and harassment investigations, reporting requirements and wider private rented sector enforcement activity.
- 5.3 At this stage, detailed allocation of funding is still being developed as part of the Council's wider implementation planning arrangements. However, it is anticipated that the funding will support areas such as officer training, legal and governance support, operational readiness, case management system improvements, reporting system improvements, enforcement procedure development and costs associated with enforcement activity and appeals. These measures are intended to ensure that enforcement activity remains consistent, auditable and legally robust.
- 5.4 Government guidance accompanying the funding allocation indicates that the funding is intended to support implementation activity and additional enforcement capacity associated with the new regulatory regime. At the present time, no additional permanent staffing commitments have been approved specifically in relation to this policy and staffing implications will continue to be reviewed as operational

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demand becomes clearer. The Private Sector Housing service is currently operating within existing approved budgets.

- 5.5 Whilst the current funding allocation relates to 2026/27, future enforcement demand, appeal activity and staffing pressures are likely to create additional ongoing financial pressures which will be actively managed through normal budget monitoring arrangements.
- 5.6 Civil financial penalties provide a mechanism for cost recovery and service sustainability. Any income generated from civil penalties must be ringfenced and reinvested into private sector housing enforcement functions in accordance with statutory requirements and internal financial governance arrangements. Government guidance accompanying the funding allocation indicates that authorities are expected to offset a proportion of enforcement costs through the use and recovery of civil financial penalties where appropriate. This reinforces the importance of maintaining robust enforcement, debt recovery and financial governance arrangements.
- 5.7 Income from civil penalties is variable and cannot be relied upon as a guaranteed funding source. The level of income will depend on the number and nature of enforcement cases, the outcome of appeals, and the Council's ability to successfully recover unpaid penalties.
- 5.8 There is a risk that civil penalties may not be recovered in full, particularly where individuals are unwilling or unable to pay. This may result in additional costs associated with debt recovery, including legal action.
- 5.9 The Council must also consider the financial implications of appeals to the First-tier Tribunal. While robust decision-making and evidentially sound enforcement practise minimises the number of appeals and improves outcomes, there remains a risk that some cases will be challenged. Where appeals arise, the Council may incur costs associated with officer time in preparing and presenting cases, and, where necessary, external legal advice. Any associated financial implications will be managed through existing service budgets and funding allocations, with ongoing monitoring through established budget and performance management arrangements.
- 5.10 Overall, the introduction of civil financial penalties supports a more sustainable enforcement model. However, the Council must continue to balance enforcement activity with available resources to ensure that the service remains financially viable and effective.

6. LEGAL IMPLICATIONS

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6.1 Amendments to the Scheme of Delegations are required to ensure officers are authorised to exercise enforcement powers and duties under the Renters Rights Act 2025 and related housing legislation. Individual officer authorisations will also be updated accordingly.

6.2 The policy confirms that formal enforcement action will only be taken where evidential thresholds and public interest tests are satisfied, reflecting requirements under the Police and Criminal Evidence Act 1984 and the Code for Crown Prosecutors. The policy also provides clear safeguards in relation to appeals, representations and tribunal proceedings.

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

7.1 The Policy has been aligned with ACEHO model enforcement policy and Civil Penalty policy. The new unitary authority will take over these duties as a local Housing Authority.

Relevant Council Priority

7.2 The implementation of the policy supports the Council's ability to meet one of the Council's priorities of 'Community & Housing'. The updated Policy directly impacts upon the residents throughout the community by ensuring that houses are safe and warm enabling the residents to be happy and Redditch a safe place to live.

Climate Change Implications

7.3 The implementation of this policy has a positive impact in relation to climate change. Through the enforcement of housing standards, including the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (Minimum Energy Efficiency Standards), the Council will support improvements to the energy efficiency of residential properties within the private rented sector.

7.4 Improved energy efficiency contributes to reduced carbon emissions, lower energy consumption and enhanced thermal performance of housing stock. This supports wider national and local climate change objectives, while also delivering benefits in terms of reduced fuel poverty and improved health outcomes for residents

Equalities and Diversity Implications

7.5 The implementation of this policy has been considered in the context of the Council's duties under the Equality Act 2010, including the Public

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Sector Equality Duty. The policy supports the Council's obligation to eliminate discrimination in the exercise of its enforcement functions.

- 7.6 Enforcement activity under this policy is expected to have a positive impact on vulnerable households, including those with protected characteristics, who are disproportionately affected by poor housing conditions and unlawful practices within the private rented sector.
- 7.7 The policy embeds a risk-based approach to enforcement, which includes consideration of vulnerability and individual circumstances when prioritising cases and determining appropriate action. This ensures that enforcement decisions are proportionate, fair and responsive to the needs of those at greatest risk of harm.
- 7.8 No adverse equality impacts have been identified. An Equality Impact Assessment will be completed prior to the implementation of this policy. While the policy primarily reflects statutory duties, the Council retains discretion in how enforcement powers are exercised. The assessment will ensure that due regard has been given to the Public Sector Equality Duty under the Equality Act 2010, including consideration of potential impacts on vulnerable groups and those with protected characteristics.

8. RISK MANAGEMENT

- 8.1 The implementation of the Enforcement and Civil Penalty Notice Policy introduces a number of operational and strategic risks. These risks have been identified and mitigation measures are in place to ensure that enforcement activity is effective, proportionate and legally robust.
- 8.2 There is a risk that enforcement action, including the serving of civil financial penalties, may be subject to challenge or appeal where processes are not correctly followed or decisions are not sufficiently evidenced.
Mitigation: The policy establishes clear evidential thresholds, decision-making frameworks and procedural requirements aligned with statutory guidance. Officers will receive appropriate training and access to legal support to ensure compliance with relevant legislation and procedural standards.
- 8.3 There is an increased likelihood of appeals to the First-tier Tribunal, which may result in penalties being reduced, overturned, or subject to delay.
Mitigation: The policy embeds a structured and consistent approach to determining civil penalties, supported by clear reasoning, proportionality assessments and robust documentation to ensure decisions are defensible.

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- 8.4 Income from civil financial penalties is not guaranteed and there is a risk that penalties may not be recovered in full, resulting in additional costs associated with debt recovery and legal proceedings.

Mitigation: The policy details appropriate debt recovery processes and penalty levels have been set in accordance with statutory guidance to maximise compliance and recovery where appropriate.

- 8.5 Increased enforcement activity may place pressure on staffing and resources, particularly where cases are complex and require significant officer time to investigate, prepare and defend enforcement action.

Mitigation: New Burdens Funding has been allocated to support implementation of the Renters Rights Act 2025 and associated enforcement activity. The Council will continue to monitor operational demand, staffing capacity, appeals activity and service pressures through normal management and budget monitoring arrangements. Officer training, procedural guidance and case management systems will support the efficient prioritisation and progression of enforcement cases.

- 8.6 There is a risk of inconsistent enforcement decisions across the service, which could undermine fairness and increase the likelihood of challenge.

Mitigation: The policy provides a clear and structured framework for enforcement decisions, including defined thresholds, proportionality assessments and case closure criteria (where compliance has been achieved, enforcement action has concluded or no further action is required) to ensure consistency across officers.

- 8.7 Enforcement action, particularly the use of civil financial penalties, may attract challenge or criticism from landlords or other stakeholders. Equally, failure to take appropriate action may undermine public confidence in the Council's regulatory role.

Mitigation: The policy promotes a balanced approach to enforcement, prioritising advice and engagement where appropriate, while ensuring that formal action is taken where statutory breaches are identified.

- 8.8 Effective enforcement relies on accurate record keeping and evidence management. There is a risk that inadequate systems or processes could weaken enforcement cases.

Mitigation: Investment in case management systems and clear procedural requirements will ensure that evidence is properly recorded, retained and accessible to support enforcement action and appeals.

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8.9 There is a risk that future enforcement demand, appeal activity and staffing pressures may exceed available funding or create additional financial pressures for the Council.

Mitigation: The Council has received New Burdens Funding to support implementation of the new regulatory regime and will continue to monitor enforcement activity, appeal trends, staffing pressures and associated financial implications through existing financial governance and budget monitoring arrangements. Civil financial penalties may assist in offsetting a proportion of enforcement costs where recovery is successful; however, income from penalties will not be relied upon as a guaranteed funding source.

8.10 There is a risk that increased use of civil penalties may influence landlord behaviour, including market withdrawal or reduced supply in the private rented sector, which may indirectly impact housing availability

Mitigation: The Council will ensure that enforcement activity is proportionate, targeted and intelligence-led, focusing on serious or repeat non-compliance rather than minor breaches. The policy prioritises advice and engagement where appropriate, with formal enforcement action directed at those who fail to meet their legal obligations. All enforcement decisions will be underpinned by statutory guidance, the Regulators' Code and robust proportionality assessments to ensure fairness and consistency. The Council will monitor enforcement activity, appeal outcomes and local market conditions to identify any unintended impacts on the private rented sector and will keep its approach under regular review to maintain an appropriate balance between regulatory intervention and market stability.

8.11 These risks will be monitored as part of ongoing service management, financial monitoring and governance arrangements, and the policy will be kept under review to ensure that it remains effective, proportionate and aligned with legislative requirements.

9. APPENDICES and BACKGROUND PAPERSAppendices

Appendix 1 - Private Sector Housing Enforcement & Civil Penalty Notice Policy
2026

Appendix 2 – New Delegations under the Renters Rights Act 2025

Appendix 3 – Note of existing delegations under the Electrical Safety Standards
In the Private Sector (England) Regulations 2020 and Section

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126 and Schedule 9 of the Housing and Planning Act 2016 to be formally included into the Scheme of Delegations.

Background papers

Following reports to Executive

- Renters Rights Act 2025 – 17th March 2026
- Electrical Safety Standards in the Private Rented Sector - 7th September 2021
- Introduction of Civil Penalties for Failure to comply with standards in the private rented sector - 11th June 2019

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20269th June**9. REPORT SIGN OFF**

Department	Name and Job Title	Date
Portfolio Holder	Cllr Bill Hartnett	14/05/2026
Lead Director / Assistant Director	Judith Willis Assistant Director Community and Housing Services	21/04/2026
Financial Services	Deb Goodall Assistant Director Financial Services	21/04/2026
Legal and Democratic Services	Nicola Cummings, Principal Solicitor – Governance and Jess Bayley-Hill, Principal Democratic Services Officer	21/04/2026

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**REDDITCH BOROUGH
COUNCIL
PRIVATE SECTOR
HOUSING
ENFORCEMENT & CIVIL
PENALTY POLICY 2026**

1. Background

Redditch Borough Council (“the Council”) has statutory duties to keep housing conditions in its area under review and to take appropriate action where residential accommodation presents risks to health, safety or welfare, or where housing related legislation is not being complied with. This policy sets out the Council’s principles for enforcing and exercising its duties as a Local Housing Authority under the relevant legislation. It has been developed having regard to government statutory guidance and recognised good practice frameworks including the Association of Chief Environmental Health Officers (ACEHO) model.

Local authorities exercising regulatory functions are required by section 5 of the Legislative and Regulatory Reform Act 2006 to publish an enforcement policy. Where regulatory functions fall within the scope of the Regulators Code, the Council is also required to have regard to that Code in the exercising of those functions. This policy provides transparency and consistency in the way the Council carries out its enforcement functions and ensures that regulatory activity is proportionate, targeted and accountable in regard to private sector housing enforcement.

This policy explains how the Council will approach housing enforcement across the private sector and how enforcement decisions will be made. It establishes the principles that guide enforcement activity and provides clarity to landlords, tenants, managing agents and other stakeholders about what can be expected from the Council when regulatory intervention is considered necessary. This policy does not apply to housing stock owned by Redditch Borough Council.

In developing this policy, the Council has had regard to relevant statutory guidance and good practise. The Council will support compliance through advice and engagement where this is appropriate and likely to be effective. However, the Council is not required to take informal action before exercising its statutory enforcement powers and may take formal action where this is necessary and proportionate to protect residents, address serious risks, and secure compliance with legal requirements.

The need for a clear and robust enforcement approach is informed by local housing conditions. Evidence indicates that a higher proportion of private rented properties contain serious hazards or fail to meet minimum standards compared with owner occupied housing throughout the Borough. The Private Sector Housing Stock Condition Survey 2024 indicates that approximately 9.9% of private rented sector dwellings contain a Category 1 hazard, compared with 5.9% of owner-occupied properties.

The same survey identified that approximately 11.3% of private rented homes and 9.7% of owner-occupied homes do not meet the Decent Homes Standard. By comparison, the English Housing Survey (2020) estimates that 17.5% of private rented homes and 15.1% of owner-occupied homes across the West Midlands do not meet the Decent Homes Standard. While overall housing conditions in the Borough compare favourably with regional averages, a significant number of properties still require intervention to address risks to occupants. This evidence supports the Council's use of a targeted and risk-based approach to enforcement activity. Detailed information on enforcement tools, procedures, penalties and officer decision making is set out in the sections that follow.

For the purposes of this policy, the term "*landlord*" includes letting agents, managing agents, licensors, property owners, directors of corporate landlords and any other person involved in the letting or management of privately rented accommodation. The terms "*House in Multiple Occupation*" (HMO) have the meaning set out in the Housing Act 2004. The term 'corporate landlord' should be read as referring to a corporate body that meets the definition of 'landlord' above.

For the avoidance of doubt, references in this policy to a "dwelling" have the meaning given by section 99 of the Housing Act 2004. The Housing Health and Safety Rating System applies only to premises that fall within that statutory definition. Caravans and mobile homes do not generally constitute dwellings for the purposes of Part 1 of the Housing Act 2004 and are not assessed under the HHSRS. Such accommodation is instead subject to regulation and enforcement under other applicable legislation, including the Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013.

2. Aims

The aim of this policy is to ensure housing enforcement action is taken lawfully, fairly and proportionately, in accordance with relevant legislation and statutory guidance, while supporting the Council's wider housing objectives. Through effective regulation and enforcement detailed within this policy provides a framework through which the Council seeks to: -

- Improve the quality of housing across the Borough
- Tackle fuel poverty and poor housing conditions
- Reduce the number of empty homes
- Support wider public health objectives and reducing health inequalities
- Support tenancy sustainment and reducing homelessness, particularly for vulnerable households
- Ensure landlords comply with their legal responsibilities
- Prevent the exploitation and poor treatment of tenants
- Contribute to safer, healthier local communities

The Council recognises that most landlords operate responsibly. The Council will therefore seek to support compliance through advice and engagement where this is appropriate and likely to be effective. However, where legal requirements are not met or risks to health or safety persist, the Council will take proportionate and effective enforcement action. Effective enforcement is essential to maintaining confidence in the private rented sector and ensuring that responsible landlords are not undercut by those who choose to operate unlawfully.

3. Scope

This policy applies to all private sector housing enforcement activity undertaken by the Council within its administrative area. It applies to all residential accommodation with the exception of Redditch Borough Council owned stock where statutory hazards or nuisances arise. The Council's private sector housing enforcement functions include the following areas: -

- **Housing Standards and Property Conditions**
 - Privately rented properties and Housing Association properties
 - Houses in Multiple Occupation (HMOs), including licensable and non-licensable HMOs for licensing and management standards
 - Owner occupied housing where hazards or statutory nuisances may arise
 - Empty properties
 - Buildings or structures used or intended to be used for human habitation, including outbuildings, sheds, garages or other non-traditional structures where occupation gives rise to risks to health, safety or welfare.

- **Tenancy Regulations and Landlord Conduct**
 - Enforcement of landlord obligations, tenancy requirements and tenant protections introduced by the Renters Rights Act 2025
 - Illegal eviction and harassment offences

- **Other Private Sector Housing Enforcement**
 - Residential mobile homes and caravan sites including licensing and site standards
 - Unauthorised encampments where the Council acts in its capacity as a land owner

All enforcement action will be carried out in accordance with relevant statutory Codes of Practice, Council procedures and protocols, and official guidance issued by central and local government bodies. In exercising its enforcement functions, the Council will act in accordance with the Equality Act 2010.

The Council recognises that certain aspects of housing-related enforcement fall under the remit of other regulatory services. In particular, enforcement of tenancy fees and prohibited payments under the Tenant Fees Act 2019 is primarily undertaken by Trading Standards. However, Private Sector Housing may identify potential breaches during the course of their duties. Where such matters are identified, cases will be referred to Trading Standards for investigation where appropriate. The Council will work collaboratively with partner services to ensure a coordinated and proportionate enforcement response.

4. Roles and Responsibilities

The effective regulation of private sector housing requires cooperation between the Council, landlords, agents, tenants and partner agencies. The following sets out the general expectations of each party.

Authorised Officers

Authorised officers will: -

- Act in accordance with this Policy, relevant legislation and statutory guidance
- Exercise professional judgement in determining appropriate enforcement action
- Act proportionately, consistently and transparently
- Ensure that decisions are properly evidenced, recorded and capable of withstanding legal scrutiny;
- Have regard to vulnerability, safeguarding considerations and equality duties when exercising enforcement functions

Landlords, Letting Agents and Managing Agents

Landlords and agents are expected to: -

- Maintain properties in compliance with all relevant legal requirements
- Respond promptly to tenant reports of disrepair or hazards
- Engage constructively with the Council and comply with statutory notices and requests for information
- Ensure that letting and management practices comply with all relevant tenancy and consumer protection legislation
- Take proactive steps to prevent risks to health and safety

Tenants and Occupiers

Tenants are expected to: -

- Report defects and hazards to their landlord or managing agent in the first instance, where it is safe and reasonable to do so
- Provide access for inspections and works where required
- Act in a tenant-like manner and not cause damage or contribute to unsafe conditions

Partner Agencies

The Council will work with partner agencies, including the Police, Fire Service, Trading Standards, Housing Options and safeguarding services, to ensure a coordinated and effective response to housing-related risks.

5. Legislative Framework

Redditch Borough Council acts as the Local Housing Authority responsible for regulating housing conditions and tenancy practices within the Borough. Under section 3 of the Housing Act 2004, the Council has a statutory duty to keep housing conditions in its district under review with a view to identifying any action that may need to be taken. Where hazards are identified (as defined by the Housing Act), the Council has powers and duties to take appropriate enforcement action in accordance with Part 1 of the Act.

Section 5 Housing Act 2004 places a duty on Local Authorities to take appropriate enforcement action where a Category 1 hazard exists. Section 7 of the Housing Act 2004 gives the Council a discretionary power to take enforcement action where a Category 2 hazard exists. The Council will usually act where a Category 2 hazard presents a significant risk to health or safety.

Section 107 of the Renters' Rights Act 2025 places a duty on the Council to enforce the landlord legislation including statutory duties and offences relating to tenancy standards, security of tenure, eviction practices, information requirements, rent practices and discrimination, as set out in the Act and associated legislation comprising of the following: -

- Chapters 3 and 6 of Part 1 of the Renters Rights Act 2025;
- Part 2 of the Renters' Rights Act 2025;
- Sections 1 and 1A of the Protection from Eviction Act 1977; and
- Chapter 1 of Part 1 of the Housing Act 1988.

Section 110, which places a duty on the Council to report to the Secretary of State on the exercise of its functions under the Landlord Legislation.

The Renters Rights Act 2025 and Part 1 of the Housing Act 2004 fall outside the scope of the Regulators Code. Where the Code does not apply, the Council will nevertheless seek to act in accordance with the principles of good regulation unless statutory duties require otherwise.

Other housing legislation enforced by the Council does however fall within the scope of the Legislative and Regulatory Reform (Regulatory Functions) Order 2007, and the

Council will act in accordance with the principles of good regulation where applicable. Legislation within the scope of the Regulators Code includes (but is not limited to): -

- Parts 8, 9 and 10 of the Housing Act 1985;
- Part 8 of the Housing Act 1996; and
- Parts 2 to 5 of the Housing Act 2004.

5.1 Primary Legislation

When exercising its housing enforcement functions, the Council may rely on the following primary legislation, where relevant (this list is not exhaustive): -

- Housing Act 2004
- Housing Act 1985
- Housing Act 1988
- Renters Rights Act 2025
- Housing and Planning Act 2016
- Protection from Eviction Act 1977
- Environmental Protection Act 1990
- Building Act 1984
- Caravan Sites and Control of Development Act 1960
- Mobile Homes Act 2013
- Police and Criminal Evidence Act 1984
- Criminal Justice & Public Order Act 1994
- Public Health Act 1961
- Prevention of Damage by Pests Act 1949
- Proceeds of Crime Act 2002
- Local Government (Miscellaneous Provisions) Act 1976
- Local Government (Miscellaneous Provisions) Act 1982
- Legislative and Regulatory Reform Act 2006
- Regulation of Investigatory Powers Act 2000

5.2 Secondary Legislation

Relevant secondary legislation includes (but is not limited to): -

- Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended)
- Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (as amended)
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006

- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007
- Mandatory Licensing of Houses in Multiple Occupation (England) Order 2018
- Any regulations made under or associated with the Renters Rights Act 2025 relevant to the Council's enforcement functions

The Council's enforcement responsibilities include both housing condition and tenancy related regulatory functions. All enforcement action will be taken in accordance with relevant statutory Codes of Practice, Council procedures, and official guidance. In exercising its functions, the Council will act in accordance with the Human Rights Act 1998 and the Equality Act 2010. All enforcement powers under the legislation referred to in this policy are exercised by officers authorised by the Council in accordance with its Constitution, scheme of delegation, and officer authorisation procedures.

6. Regulatory Principles

The Council fulfils its regulatory role through a combination of proactive inspection, intelligence-led investigation, reactive complaint response and multi-agency working. The Council may investigate: -

- The physical condition of residential accommodation
- Management of the residential accommodation/mobile home site
- The conduct of landlords, agents and other relevant persons
- Compliance with relevant legislation.

In order to secure compliance, the Council may use the full range of statutory powers where available, necessary and proportionate to protect occupants and improve housing conditions. In carrying out its regulatory functions, the Council will act in accordance with the following principles of good regulation: -

- **Proportionate** – Enforcement action will reflect the seriousness of the breach and the risks posed to occupants.
- **Targeted** – Resources will be directed towards the most serious housing hazards, the highest risks to health and safety, and the most serious or repeated breaches of landlord obligations.
- **Consistent** – Similar cases will be treated in a consistent manner, while recognising the specific circumstances of each case.
- **Transparent** – Landlords, tenants and property owners will be provided with clear information about legal requirements and enforcement decisions.
- **Accountable** – Officers will explain enforcement decisions and provide information on rights of appeal and complaint procedures.

Advice, guidance and engagement may be used where appropriate and likely to be effective, but nothing in this policy requires the Council to take informal action before exercising formal enforcement powers.

7. Prioritisation and Use of Discretion

The Council has a duty to regulate housing conditions and tenancy practices across the Borough; however, it is not required to investigate every potential breach. Enforcement activity will be prioritised based on: -

- The level of risk to health or safety
- Evidence of non-compliance
- The potential harm to occupants or the wider community.

Nothing in this policy creates a duty on the Council to take enforcement action in any particular case, nor does it confer a right on any person to require the Council to investigate or act. The Council retains discretion to determine whether to investigate and whether to exercise any of its statutory powers, having regard to the available evidence, the relevant legal framework, and the professional judgement of authorised officers.

The Council may only exercise enforcement powers in respect of properties located within its district, unless another Local Housing Authority has formally delegated functions to Redditch Borough Council. Where a landlord or business is subject to a Primary Authority partnership, the Council will have regard to the applicable Primary Authority and its advice in accordance with statutory requirements. For the purposes of this policy, a *Primary Authority partnership* is an arrangement under Part 2 of the Regulatory Enforcement and Sanctions Act 2008 under which a business receives assured advice from a nominated enforcing authority.

The Council may have regard to patterns of conduct across a landlord's property portfolio, including evidence of repeated breaches, systemic non-compliance or failure to respond to previous enforcement action. This may include reviewing enforcement history, regulatory datasets, licensing records, housing benefit, council tax or information lawfully shared by partner agencies.

Where a complaint has been investigated and inspected and an authorised officer is satisfied, that no actionable hazard or breach of housing legislation exists, the case will be closed with no further action. The Council is not required to carry out repeated inspections where issues have already been assessed and no breach identified. The local authority will not normally undertake further investigation unless new evidence or materially changed circumstances are presented. The Council retains discretion to determine whether further investigation is appropriate in any individual case.

Where landlords or property owners fail to meet their legal responsibilities, or where housing conditions or tenancy practices present a risk to the health or safety of occupiers, the Council will take proportionate enforcement action. The Council recognises that poor housing conditions and unsafe tenancy practices can have a disproportionate impact on vulnerable residents and will prioritise enforcement action where serious hazards affect those at greatest risk. In deciding whether, when, and how to pursue enforcement and recovery action, the Council will have regard to any known vulnerability, health needs or welfare concerns, while ensuring that legal requirements are enforced and unlawful conduct is not left unaddressed.

In exercising its discretion, the Council may have regard not only to the underlying breach, but also to a person's conduct following enforcement action, including any failure to engage, delay, or comply with requirements such as the payment of civil financial penalties.

8. Initial Complaints and Informal Resolution

The Council will normally expect that, where appropriate and safe to do so, tenants will first raise concerns regarding housing conditions with their landlord or managing agent. Landlords are expected to take reasonable steps to investigate and address reported issues within a reasonable timeframe. The Council may take this into account when determining whether to intervene; however, this will not prevent the Council from taking immediate action where: -

- there is a serious risk to health or safety;
- there is evidence of harassment, illegal eviction or retaliatory action;
- the occupier is vulnerable; or
- there is clear evidence of non-compliance.

Nothing in this section limits the Council's discretion to take formal enforcement action at any stage where it considers it necessary and proportionate.

9. Investigatory powers and powers of entry

In addition to the Council's informal and formal powers of enforcement, there are investigatory powers relating to the collection of information and relating to the entry of premises. Investigatory powers will only be exercised where it is necessary and proportionate to do so for the purposes of enforcing housing legislation and in accordance with statutory safeguards. For the purposes of this section, *rented accommodation legislation* means: -

- Sections 1 and 1A of the Protection from Eviction Act 1977;
- Chapter 1 of Part 1 of the Housing Act 1988;
- Parts 1 to 4 and 7 of the Housing Act 2004 ;
- Section 83(1) or 84(1) of the Enterprise and Regulatory Reform Act 2013;
- Sections 21 to 23 of the Housing and Planning Act 2016;

- Chapter 3 of Part 1 and Part 2 of the Renters' Rights Act 2025.

9.1 Power to Investigate

Section 114 Renters Rights Act 2025 gives the Council power to issue a notice to a relevant person to require that person to provide specified information to the Council. This notice may be given to any person with an estate or interest in the land, the licensor, their agents, or a marketer of a property. It may be served for the investigation relating to the rented accommodation legislation.

Failure to comply with section 114 notice is an offence under section 131 Renters Rights Act 2025, as is being obstructive and intentionally or recklessly making false or misleading statements in response to a section 113 notice. Section 115 Renters Rights Act 2025 permits the Council when it reasonably suspects a breach of the rented accommodation legislation to issue a notice to any person requiring them to provide the information specified. This may only be done to investigate whether a breach has occurred under rented accommodation legislation, or to determine the amount of a penalty.

Where an individual has not complied with a section 115 notice, section 116 Renters Rights Act 2025 enables the Council to make an application to the Court to enforce the provisions of the notice and seek reimbursement for the costs of the application. Section 131 Renters Rights Act provides that, in addition to the offence of non-compliance with a Section 114 notice, it is an offence for an individual to obstruct a Council officer seeking to exercise their powers without reasonable excuse. It is also an offence to fail to give an officer any additional assistance or information which they reasonably require without reasonable excuse.

Section 235 Housing Act 2004 allows the Council to issue a notice to relevant individuals, including occupiers, directing them to provide specified documents under their control for the purpose of investigating whether an offence has been committed under Parts 1 to 4 of the Housing Act 2004 or exercising the Council's functions under Parts 1 to 4 of the Housing Act 2004.

Section 16 Local Government (Miscellaneous Provisions) Act 1976 also permits the Council to issue a notice to an occupier, manager, or individual with an interest in the land to compel them to provide the Council with information on the nature of their interest and the names and addresses of current occupiers and of any others with an interest in the land.

Where relevant to the Council's housing enforcement functions, investigatory powers may also be exercised under the Environmental Protection Act 1990 and the

Prevention of Damage by Pests Act 1949 for the purposes of investigating statutory nuisances or pest-related conditions affecting residential premises.

10. Decision Making Framework

The Council adopts a structured and proportionate approach to decision-making in all enforcement cases. The purpose of this framework is to ensure that enforcement action is consistent, transparent, evidence-based and proportionate to the risk posed. Enforcement decisions will be informed by a range of factors including: -

- The seriousness of the breach
- The level of risk or harm to occupants or the wider community
- The vulnerability of those affected
- The conduct, culpability and compliance history of the landlord or responsible person
- The likelihood of achieving compliance through different forms of intervention.

To support consistency in decision-making, the Council applies a structured escalation approach which reflects the severity of the case.

Band 1 – Informal Resolution

Cases involving minor deficiencies or low risk where there is no immediate threat to health or safety. Action is likely to include advice, guidance, or informal engagement.

Band 2 – Non-Punitive Formal Action

Cases where there is evidence of non-compliance but the risk remains moderate and can be addressed without punitive action. Action may include formal notices, licence conditions, or other regulatory interventions designed to secure compliance.

Band 3 – Formal Enforcement

More serious cases involving significant non-compliance, elevated risk, or failure to respond to previous interventions. Action may include civil financial penalties, formal investigations, or other enforcement measures.

Band 4 – Serious / High Harm Cases

The most serious cases involving significant harm, deliberate or reckless conduct, or repeated non-compliance. Action is likely to include prosecution, banning order applications, or the imposition of substantial financial penalties.

The bands are intended to guide and support officer decision-making. Each case will be considered on its individual merits, and authorised officers retain discretion to depart from this framework where justified, provided that the reasons for doing so are properly recorded.

Recording of Decisions

All enforcement decisions will be documented in accordance with the Council's procedures and governance arrangements. Records will include the evidence relied upon, the options considered, and the reasons for the decision taken. Where prosecution or other formal legal action is proposed, cases will be reviewed in accordance with the Code for Crown Prosecutors and, where required, in consultation with Legal Services.

Records will, where appropriate, include: -

- the nature of the breach or hazard identified
- the evidence relied upon
- the relevant legislative provisions
- the enforcement options considered
- the reasons for selecting the chosen course of action
- consideration of proportionality, vulnerability and public interest
- details of officer authorisation and, where required, legal advice

This ensures transparency, consistency and that decisions are capable of withstanding challenge through appeal, complaint or legal proceedings.

11. Entry to Premises

Section 118 Renters Rights Act 2025 permits Council officers to enter business premises of relevant people (including landlords, letting agents, and marketers) if it is necessary for the production or seizure of documents under section 122-123 Renters Rights Act 2025. This power will be exercised without a warrant.

Section 121 Renters Rights Act 2025 allows an authorised Council officer named in a warrant to enter premises used for a rental sector business which is not mainly accommodation if there are documents on the premises which the officer could require under section 122 or seize under section 123. In addition, for this power to be exercised, one of the following conditions must be met: -

- That access to the premises has been or is likely to be refused, and the Council has provided notice of their intention to apply for a warrant to the occupier
- Those documents on the premises would likely be concealed or interfered with if notice of entry were to be given
- That no occupier is present, and waiting for their return might defeat the purpose of the entry

Following a section 118 or section 121 Renters Rights Act 2025 entry, section 122 allows an officer at any reasonable time to require a relevant person on the premises to produce any documents relating to the business and to take copies of them. This

may only be exercised to ascertain whether there has been a breach of the rented accommodation legislation where an officer reasonably suspects there has been a breach or an offence; or to ascertain whether the documents may be required in evidence for proceedings regarding a breach or offence.

Following a section 118 or section 121 Renters Rights Act 2025 entry, section 123 authorises Council officers to seize and detain documents that the officer reasonably suspects may be required as evidence in proceedings relating to a breach of, or an offence under, the rented accommodation legislation. When doing so, the officer will provide evidence of the officer's identity and authority if reasonably practicable. The officer will take reasonable steps to inform the person from whom documents have been seized that they have been seized and will provide that person with a written record of what has been taken. Documents seized will be retained only for as long as reasonably necessary for the purposes of the investigation or any related proceedings and will be returned as soon as practicable thereafter, unless lawfully retained.

Section 126 Renters Rights Act 2025 permits the Council to enter residential premises used for a tenancy at a reasonable time if the officer considers it necessary as part of an investigation into potential offences specified in subsection 1(b). Where required, the Council will give at least 24 hours' notice of this to the occupier and individuals with an interest in the property as per subsection 1(c), detailing in writing why the entry is necessary and the suspected offences. Where there are occupiers found on the premises, the officer will provide evidence of the officer's identity and authority to at least one of the occupiers if reasonably practicable.

In addition, section 239 Housing Act 2004 permits Council officers to enter, if necessary and at a reasonable time, a property to carry out a survey or examination. This may be done if any one of the following is met: -

- to determine if any Part 1-4 enforcement functions should be exercised
- the premises are part of an Improvement Notice or Prohibition Order
- a management order is in force under Chapter 1 or 2 of Part 4 on the premises

In certain circumstances the Council may obtain a warrant to enter by force, if necessary, under section 240 Housing Act 2004.

11.2 Other Statutory Powers of Entry

In addition to the investigatory powers contained within the Renters Rights Act 2025 and the Housing Act 2004, the Council has powers under a range of other primary legislation to enter premises, obtain information and carry out inspections for the purposes of enforcing housing, public health and related regulatory requirements.

Under section 81 of the Environmental Protection Act 1990 and associated provisions of that Act, the Council has powers of entry for the purposes of investigating and dealing with statutory nuisances, including conditions that may be prejudicial to health or constitute a nuisance. Council officers may enter premises at reasonable times to investigate complaints, carry out inspections, assess conditions, take measurements or gather evidence for the purposes of determining whether a statutory nuisance exists or for taking enforcement action under the Act. Where required by the legislation, advance notice will be given. Where entry is refused or otherwise obstructed, the Council may apply to the court for a warrant authorising entry.

Under the section 4 of the Prevention of Damage by Pests Act 1949 and associated provisions of that Act, the Council has powers to enter land or premises for the purpose of inspecting for, preventing or dealing with infestations of rats or mice. These powers may be exercised to establish whether treatment or works are required, to monitor compliance with statutory notices, or to carry out works in default where appropriate. Entry will normally be at reasonable times and in accordance with the procedural requirements of the Act.

Under section 95 of the Building Act 1984, the Council may exercise powers of entry for the purpose of carrying out functions under the Act, subject to the statutory requirements relating to notice and warrants. These powers may be used in connection with those building-related functions and delegations exercised by the Council, such as inspections relating to drainage, defective buildings or dangerous land. Where necessary and permitted by law, the Council may apply to the court for a warrant authorising entry, including entry by force.

The Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013 operate together to regulate residential caravan and mobile home sites. The Mobile Homes Act 2013 strengthens the site licensing and enforcement regime under the 1960 Act, including compliance notices, emergency action and works in default.

Under section 26 of the Caravan Sites and Control of Development Act 1960, authorised Council officers have powers to enter land used as a caravan site, including licensed residential caravan sites, at reasonable times and on production of authority if required. Entry may be exercised for the purposes of inspecting sites, assessing compliance with site licence conditions, investigating potential contraventions and taking enforcement action where permitted. Where required by law, at least 24 hours' notice of entry will be given to the occupier. Where entry is refused, anticipated to be refused, or where giving notice would defeat the purpose of entry, the Council may apply to the court for a warrant authorising entry, including entry by force where permitted by statute.

In relation to empty or unoccupied residential premises, the Council may exercise powers of entry where authorised by relevant legislation and where inspections are necessary to assess risks to neighbouring properties or the wider community. Such entry may be undertaken, where statutory requirements are met, under provisions including the Housing Act 2004, the Environmental Protection Act 1990, the Building Act 1984, or the Local Government (Miscellaneous Provisions) Act 1982. These powers may be used, for example, to investigate potential housing hazards, statutory nuisances, dangerous conditions, or to secure unoccupied buildings where this is necessary in the interests of public safety.

Any powers of entry in relation to empty or unoccupied premises will be exercised in accordance with the specific procedural requirements of the relevant legislation, including notice and warrant provisions where applicable.

11.3 General Provisions

Where legislation requires notice to be given prior to entry, the Council will comply with those requirements. Where consent to enter is refused, or where entry is otherwise impracticable, the Council may apply to the court for a warrant authorising entry, including entry by force where permitted by law. All powers of entry will be exercised reasonably and proportionately, and in accordance with: -

- Relevant statutory provisions and safeguards
- Applicable Codes of Practice
- Council procedures and governance arrangements
- The Human Rights Act 1998 and the Equality Act 2010.

Entry powers will be exercised only where necessary and proportionate for the purposes of enforcing relevant legislation and securing compliance.

12. Enforcement Action

The Council aims to support responsible landlords and property owners to raise and maintain housing standards. Landlords are expected to have an appropriate understanding of the legal requirements relating to the condition and management of privately rented accommodation and to take proactive steps to ensure compliance.

The Council will seek to secure compliance through advice, guidance and engagement wherever this is appropriate and likely to be effective. However, the Council is not required to take informal action before taking formal enforcement action and may proceed directly to formal measures where it considers this necessary and proportionate, having regard to the seriousness of the breach and the risk of harm.

In deciding the most appropriate course of action, officers will have regard to the circumstances of the case, the nature and extent of any breach, the degree of risk posed to occupiers or others, and the likelihood of achieving compliance within a reasonable timeframe.

12.1 Informal action

Informal enforcement action may include the provision of written or verbal advice, guidance, warnings, or requests for voluntary compliance. In some cases, a visit by authorised officers may be undertaken at the outset where an initial complaint, referral or other information indicates that an inspection or investigation is warranted.

Where officers visit a property, whether following a complaint, as part of a planned audit, or because of a landlord's failure to adequately resolve a reported issue informal action may be considered sufficient where only very minor deficiencies are identified and there is no immediate risk to health or safety. Where written advice is provided, this will normally specify the action required and include reasonable timescales for compliance.

While the Council will use its discretion on whether to take informal action in cases involving Category 2 hazards, it is not required to provide written or verbal advice before commencing formal enforcement action and may proceed directly to statutory measures where this is considered appropriate.

In relation to matters regulated under legislation other than the Housing Act 2004 and the Renters Rights Act 2025, the Council may also seek to secure compliance through informal enforcement action where it considers this appropriate. Informal engagement may be used where inspections or investigations identify minor deficiencies, low level breaches, or matters that do not present an immediate risk to health or safety.

12.2 Formal action

Formal enforcement action may be taken where informal action is ineffective, inappropriate, or insufficient to address risks to health, safety or the environment, or where the Council considers that informal engagement is unlikely to secure compliance. Formal enforcement action may be taken without prior informal action where, for example: -

- there are serious risks to health or safety
- there is deliberate, reckless or blatant non-compliance
- there is a history of previous breaches or failures to comply, or
- informal engagement is unlikely to achieve timely or effective compliance

The Council will therefore select the most appropriate enforcement tool having regard to the relevant legislation, the circumstances of the case, and the principle of proportionality.

The following sections describe the principal statutory enforcement powers available to the Council under specific legislative regimes. The choice of enforcement tool in any case will depend on the nature of the breach, the level of risk, the evidence available, and what is necessary and proportionate to secure compliance and protect occupants.

12.3 Enforcement

12.3.1 Housing Act 2004 Part 1

Where hazards are identified in a dwelling, the Council may exercise its powers under Part 1 of the Housing Act 2004. These powers include the service of the following notices and orders: -

- **Improvement Notice** – In respect of any Category 1 hazards and any Category 2 hazards. This requires the person to whom it is served to undertake the specified remedial action within a stated period. The mandated work and the timeframe will be determined by the Council depending on the nature and scale of the work.
- **Prohibition Order** - In respect of any Category 1 hazards and any Category 2 hazards on the property. This prevents occupation of whole or part of the property, or can be used to limit occupant numbers, within a specified time frame.
- **Hazard Awareness Notice** - In respect of any Category 1 hazards and any Category 2 hazards on the property. This makes the owner and occupiers aware of the hazards identified however, it does not require remedial action. As a result, and because it does not secure risk reducing works within a specified timeframe, a Hazard Awareness Notice will not usually be the most appropriate course of action where remedial works are necessary to reduce the risk of harm to occupiers or potential occupiers.
- **Emergency Prohibition Order** – To immediately prohibit the use of all or part of a dwelling where there is an imminent risk of serious harm to the health or safety of the occupants or others.
- **Emergency Remedial Action** - Where there is a Category 1 hazard present, section 40 of the Housing Act 2004 allows the Council to undertake Emergency Remedial Action on the Category 1 hazard without prior notice.
- **Suspended Improvement/Prohibition Order** - The Council also has the power to suspend action taken under Part 1 Housing Act 2004 in situations where it has the power or duty to take enforcement action. This will be at the

Council's discretion and will normally be considered for the purpose of minimising inconvenience to the current occupiers.

- **Demolition and Clearance** - Where the statutory criteria are met, the Council may consider action under Parts 9 and 10 of the Housing Act 2004 in respect of dwellings that are unfit for human habitation or areas containing multiple such dwellings.

Non Compliance with Housing Act 2004

- Failure to comply with an Improvement Notice under section 30, or a Prohibition Order under section 32, of the Housing Act 2004 is a criminal offence. The Council may consider prosecution or the imposition of a civil financial penalty, having regard to the circumstances of the case and statutory guidance.

Other formal notices served by the Council may not relate to the landlord undertaking remedial works but may cover a range of other matters including, but not limited to, exercising a right of entry under section 239 of the Housing Act 2004 and a request to provide information or the need to abate or avoid overcrowding.

12.3.2 Renters Rights Act 2025

The Council has specific statutory duties to enforce landlord obligations and tenant protection provisions introduced by the Renters Rights Act 2025. In exercising its functions under the Renters Rights Act 2025, the Council may investigate and take enforcement action in relation to breaches of the landlord legislation, including (but not limited to): -

- Failures to comply with prescribed tenancy requirements
- Unlawful eviction and harassment offences
- Attempts to end tenancies otherwise than in accordance with the prescribed statutory process
- Misuse or abuse of possession grounds
- Failures to provide required information to tenants
- Breaches of restrictions on reletting, remarketing or rent practices
- Unlawful discrimination against prospective tenants in breach of the Renters Rights Act 2025. The Council recognises that other forms of discrimination in the letting process may arise under separate legislative frameworks. These are addressed elsewhere in this policy.

Enforcement action under the Renters Rights Act 2025 may include the service of statutory Notices, the requirement to provide information, the imposition of civil financial penalties, prosecution, applications for rent repayment orders, or other regulatory action permitted by law. Enforcement under the Renters' Rights Act 2025

is primarily offence-based and may be addressed through civil penalties, prosecution and other statutory remedies rather than through prescriptive notice regimes.

In determining the most appropriate enforcement response, the Council will have regard to the circumstances of the case, including the seriousness of the breach, the impact on the tenant, any evidence of deliberate, reckless or repeated non-compliance, and the need to protect tenants from unfair or unlawful practices.

12.3.3 Right to Rent Avoidance of Discrimination

The Council recognises the requirements placed on landlords under the Immigration Act 2014 and associated secondary legislation in relation to Right to Rent checks. Section 23 of the Act provides for a Code of Practice issued by the Home Office to ensure that such checks are carried out without unlawful discrimination.

Enforcement of immigration legislation does not fall within the remit of the Council's Private Sector Housing functions. However, the Council recognises that discriminatory letting practices may impact access to accommodation and contribute to housing need. Where such practices are identified, the Council may: -

- provide advice and guidance to landlords on lawful letting practices
- signpost to relevant statutory codes of practice
- consider whether wider housing enforcement powers are engaged
- work with partner agencies where appropriate.

12.4 Other Housing and Public Health and Environmental Legislation

12.4.1 Environmental Protection Act 1990

Under the Section 79 to 80 of the Environmental Protection Act 1990, the Council has powers to take enforcement action in relation to statutory nuisances, including conditions that are prejudicial to health or constitute a nuisance.

Where a statutory nuisance is identified, or is likely to occur, the Council may serve an Abatement Notice requiring the nuisance to be discontinued, restricted or prevented, or requiring works to be carried out. Failure to comply with an Abatement Notice is a criminal offence and may result in prosecution or further enforcement action, including works in default where appropriate.

12.4.2 Prevention of Damage by Pests Act 1949

Under section 4 of the Prevention of Damage by Pests Act 1949, the Council has powers to require owners or occupiers of land or premises to take steps to prevent or eradicate infestations of rats or mice.

Enforcement action may include the service of statutory notices requiring treatment or works to be carried out, monitoring compliance, and the carrying out of works in default where necessary. Failure to comply with a notice may lead to prosecution and/or the recovery of costs incurred by the Council.

12.4.3 Building Act 1984

Under the Building Act 1984, the Council may take enforcement action in connection with those building-related functions delegated to it under the Act, where statutory conditions are met. This may include action in respect of buildings or land presenting risks to persons or property, or where works are required to address defective conditions within the Council's remit.

Formal enforcement action may include the service of statutory notices requiring remedial works to be carried out, the taking of emergency action where there is an imminent risk of serious harm, or the carrying out of works in default, in accordance with the provisions of the Act. Any enforcement action will be taken only where authorised by law and where other regulatory powers are not more appropriate.

12.4.4 Caravan Sites and Control of Development Act 1960 & Mobile Homes Act 2013

In relation to licensed residential caravan sites and protected mobile home sites, the Council has enforcement powers under the Caravan Sites and Control of Development Act 1960 and the Mobile Homes Act 2013.

Formal enforcement action may be taken where a site is operating without a licence, site licence conditions are not complied with, where site management standards are deficient, or where offences are identified. Enforcement action may include the service of statutory or compliance notices, emergency action where permitted, the carrying out of works in default, and the prosecution of offences in accordance with the relevant legislation.

12.4.5 Empty Properties

The Council will take a proactive and risk-based approach to the identification and management of empty private residential properties, recognising the impact that long-term vacant dwellings can have on housing supply, neighbourhood amenity and community wellbeing.

Where empty or unoccupied properties give rise to housing hazards, statutory nuisances, anti-social behaviour or other breaches of housing-related legislation, the

Council may take proportionate enforcement action using the relevant statutory powers available to it.

The Council's approach to empty properties is supported by its adopted Empty Homes Strategy 2026, which sets out the Council's wider objectives, priorities and non-statutory interventions for bringing empty homes back into use. This Enforcement Policy provides the framework through which statutory enforcement and regulatory powers may be exercised, where appropriate, to support the delivery of those objectives.

The Council will seek, in the first instance, to work with owners to bring empty properties back into use through advice, engagement and voluntary measures. However, where voluntary action is not achieved, the Council may consider proportionate enforcement action in accordance with this policy and the relevant statutory framework.

Enforcement options may include: -

- service of statutory notices to address housing hazards, statutory nuisances, waste accumulation or defective conditions;
- action to secure properties where they present a risk to public safety;
- carrying out works in default where required works are not undertaken;
- recovery of costs incurred by the Council, including through local land charges; and
- consideration of enforced sale procedures where debts are secured against a property.
- Consideration of compulsory purchase orders

Where statutory criteria are met, the Council may also consider the use of Interim or Final Empty Dwelling Management Orders under Part 4 of the Housing Act 2004, or compulsory purchase powers, in accordance with adopted policies, corporate governance arrangements and decision-making procedures. The Council will prioritise long-term empty properties that have a significant adverse effect on the local community and may adopt a coordinated approach involving internal services and external partners to support their return to occupation.

12.4.6 Electrical safety / smoke and carbon monoxide / energy efficiency

The Council may take enforcement action to secure compliance with statutory private rented sector safety and energy efficiency requirements. This includes duties relating to electrical safety standards, smoke and carbon monoxide alarms, and minimum energy efficiency standards.

In relation to energy efficiency, the Council enforces the Minimum Energy Efficiency Standards under the *Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (as amended)*. Where landlords fail to comply with the prescribed minimum energy efficiency standard or other regulatory requirements, the Council may take enforcement action, which may include the service of compliance notices, the requirement to provide information, and the imposition of civil financial penalties.

Enforcement of electrical safety requirements and smoke and carbon monoxide alarm standards may also include the service of statutory notices and the imposition of civil financial penalties in accordance with the relevant regulations. Further detail on the Council's approach, including statutory statements of principles for determining penalties, is set out in Appendix 2 and Appendix 3.

12.4.7 HMO licensing and management

The Council may take enforcement action to secure compliance with Houses in Multiple Occupation (HMO) licensing requirements, licence conditions and management standards, including the imposition of civil financial penalties or prosecution where appropriate. Enforcement action may include the service and enforcement of licence conditions and requirements imposed under the Housing Act 2004 and associated Management Regulations.

HMO licences may include conditions requiring works to be carried out or measures to be taken to meet prescribed standards, including compliance with the Management of Houses in Multiple Occupation (England) Regulations. In general, the Council will seek to address Category 1 and Category 2 hazards through the exercise of its powers under Part 1 of the Housing Act 2004. This does not prevent the Council from imposing licence conditions relating to the provision, installation or maintenance of facilities or equipment, even where similar outcomes could be achieved through Part 1 enforcement.

Failure to comply with HMO licence conditions or management requirements is a criminal offence and may result in prosecution or the imposition of a civil financial penalty, having regard to the circumstances of the case and relevant statutory guidance.

The Council has adopted local amenity standards for HMOs, published as "Amenity Standards", which set out minimum requirements for facilities and space. Compliance with these standards forms a condition of all HMO licences issued within the Borough.

12.4.8 Illegal eviction and harassment

The Council will investigate and take enforcement action in relation to illegal eviction and harassment offences, including offences under the Protection from Eviction Act 1977 and related tenant-protection provisions. Such action will be taken in accordance with the applicable evidential tests and public interest considerations.

Enforcement action may include the imposition of civil financial penalties, prosecution, or other regulatory action permitted by law, including enforcement of relevant duties and offences introduced by the Renters' Rights Act 2025. In determining the appropriate response, the Council will have regard to the seriousness of the conduct, the impact on the occupier, and the need to protect tenants from unlawful interference with their occupation of residential premises.

12.4.9 Traveller Incursions on Local Authority Land

This section sets out the Council's approach to unauthorised encampments on land it owns or manages. In dealing with unauthorised encampments, the Council is acting primarily in its capacity as a landowner rather than as a housing regulator.

Where an unauthorised encampment occurs on Redditch Borough Council land, the Council will adopt a lawful, proportionate and case-specific approach. In determining the appropriate response, the Council will have regard to all relevant circumstances, including:

- the location, use and characteristics of the land occupied;
- any risks to health, safety or public amenity;
- the presence of children, elderly persons or individuals with health, welfare or support needs;
- any evidence of criminal activity, significant disruption or environmental harm; and
- the availability of alternative authorised sites or appropriate support.

The Council recognises the need to balance the rights and welfare of individuals occupying land without authorisation with the rights of the wider community and its responsibilities to protect public land, public safety and amenity. When considering any action in relation to unauthorised encampments, the Council will have due regard to its duties under the Equality Act 2010 and the Human Rights Act 1998.

Where appropriate, and having considered all relevant circumstances, the Council may take enforcement action as a landowner. This may include, but is not limited to:

- seeking possession of land through civil proceedings;

- the service of notices or the taking of action under relevant housing, public health or environmental legislation where statutory criteria are met;
- the recovery of costs associated with enforcement or remediation, where lawful to do so; and
- working with the Police or other agencies where statutory thresholds for involvement are met.

Matters relating to unauthorised encampments will normally involve joint working with partner agencies, which may include the Police, Legal Services, Housing, Environmental Health, Public Health and safeguarding services. Where welfare needs or safeguarding concerns are identified, the Council will ensure that appropriate enquiries are made and that relevant support services are engaged before, or alongside, any enforcement action.

The Council retains discretion as to whether, and how, enforcement action is taken in relation to unauthorised encampments. Nothing in this policy creates a duty on the Council to take enforcement action in any particular case, nor does it confer any right on any person to require the Council to act. Any action taken will be proportionate, justified and recorded, with decisions made by authorised officers in accordance with the Council's governance arrangements.

13. Work in default

Where legislation permits, the Council may carry out works in default where a person has failed to comply with the requirements of a statutory notice or with licence conditions, or where urgent action is required and the relevant statutory criteria are met. Works in default may be undertaken under a range of legislative regimes, including housing, public health, environmental and site licensing legislation.

The carrying out of works in default is an enforcement option available to the Council in addition to other action for non-compliance, such as prosecution or the imposition of civil financial penalties. The Council is under no duty to undertake works in default and will do so only where it considers this necessary, appropriate and proportionate to secure compliance or to remove or reduce risks to health, safety or amenity.

Where works in default are undertaken, the Council will seek to recover its reasonable costs in accordance with the relevant statutory provisions. This may include the application of local land charges or other lawful cost-recovery mechanisms.

Decisions to carry out works in default will be taken by authorised officers having regard to the circumstances of the case, the seriousness of the breach, the risk posed, the availability of alternative enforcement options, and the Council's governance and financial procedures.

14. Enforcement Outcomes for Non-Compliance

14.1 Prosecution

Prosecution is a formal enforcement option available to the Council in respect of criminal offences under housing and related legislation. Where legislation provides an alternative of a civil financial penalty, the Council will normally consider prosecution only in more serious cases.

Prosecution will normally be considered where one or more of the following circumstances apply: -

- A breach has resulted in serious harm or risk of serious harm to occupants or others
- There is evidence of deliberate, reckless or persistent non-compliance
- There have been repeated breaches or a history of non-compliance
- There has been a failure to comply with a statutory notice
- False or misleading information has been provided to the Council
- An individual has obstructed officers in the course of their duties
- The offence is of such seriousness that a financial penalty would not be an appropriate response
- It is necessary to act as a deterrent and protect the wider community

The decision to prosecute will be made having regard to the evidential sufficiency of the case and the public interest factors set out in the Code for Crown Prosecutors, issued by the Director of Public Prosecutions. In determining whether prosecution is appropriate, the Council will consider the seriousness of the offence, any evidence of deliberate or reckless conduct, the harm caused, and the deterrent effect of formal legal proceedings.

In circumstances where an offence has been committed by a corporate body, relevant legislation may permit enforcement action to be taken against company officers or, where applicable, company members, in addition to or instead of the corporate body itself. The Council will determine, on a case-by-case basis, whether enforcement action against individuals is appropriate, having regard to their level of responsibility and involvement in the offence. The Council may, where appropriate following conviction, consider the use of confiscation proceedings under the Proceeds of Crime Act 2002 to recover financial benefit obtained as a result of criminal conduct.

14.2 Civil Financial Penalties for specified offences

The Council may impose civil financial penalties where legislation provides an alternative to prosecution. Civil penalties will be imposed in accordance with statutory guidance and this policy.

If a landlord has committed multiple breaches or offences, a separate civil penalty can, and usually will, be imposed for each breach and offence. In each case, the level of any civil penalty imposed will be determined in accordance with this policy. If multiple landlords have committed the same breach or offence at the same property, a separate civil penalty can, and usually will, be imposed on each offender. In each case, the level of civil penalty imposed on each offender will be in accordance with this policy.

This section of the policy outlines the Council's methodology and mechanism for assessing and setting the level of a civil penalty at all stages where a civil penalty is under consideration, including the preparation of a notice of intent, and where a final decision has been made to impose a civil penalty.

When applying the civil penalties matrix, interim calculations at individual stages may result in figures that exceed the statutory maximum. Where the final amount reached following application of all relevant steps exceeds the statutory maximum, the civil penalty will be reduced to the applicable statutory maximum.

The Council considers the need for transparency and consistency to be of primary importance to ensure fairness in the discharge of its functions. The general objective of this policy is, therefore, to promote both transparency and consistency in the imposition of financial penalties so that those involved in the letting or management of accommodation

- (a) know how the Council will generally penalise relevant breaches and offences and;
- (b) are assured that, generally, like cases will be penalised similarly, and different cases penalised differently.

The Council recognises that, despite its best efforts, landlords may operate unlawfully for a significant period without detection, and that only a proportion of those committing relevant breaches and offences will be identified. Accordingly, the Council seeks to ensure that civil penalties are set at a level that makes it clear to the landlord concerned and to others that operating unlawfully as a landlord is financially disadvantageous when compared to operating lawfully.

The Council has a duty to act fairly, transparently and consistently when assessing civil penalties. To maintain fairness between all landlords, the Council will not give weight to claims advanced as factors that might reduce the amount of a civil penalty unless those claims are supported by evidence that the Council reasonably considers to be relevant, reliable, credible, and sufficient in scope and detail to enable proper assessment of the claim, having regard to the nature of the claim, the information ordinarily available to the landlord, and the need for consistent and fair decision-making. Allowing inadequately evidenced assertions to influence outcomes would risk

rewarding those who provide incomplete or misleading information and would create an unfair advantage over landlords who provide a full and properly evidenced account.

Accordingly, the Council expects landlords against whom a civil penalty is being considered to provide all documents and records that would ordinarily exist if their account were accurate. Where such evidence is not provided, and no explanation that the Council considers adequate is given, the Council may draw an adverse inference.

Where claims are advanced without sufficient supporting evidence, the Council may request specified supporting material before determining whether to issue a final notice or whether any mitigation has been sufficiently evidenced so as to justify a lower civil penalty. The Council has the power to impose a Civil Financial Penalty for the following: -

- Unlawful eviction and harassment of occupier as defined under the Protection from Eviction Act 1977
- Failure to comply with an Improvement Notice [s30 Housing Act 2004]
- Offences in relation to licensing of Houses in Multiple Occupation (HMOs) [s72 Housing Act 2004]
- Offences in relation to the Selective Licensing of 'houses' [s95 Housing Act 2004]
- Failure to comply with an Overcrowding Notice [s139 Housing Act 2004]
- Failure to comply with a management regulation in respect of an HMO [s234 Housing Act 2004]
- Offences in relation to Regulation 3 of the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020
- Failure to comply with a banning order [s21 Housing and Planning Act 2016]
- Failure to give a written statement of terms under section 16D of the Housing Act 1988
- Failure to give an existing tenant information about changes made by the Renters' Rights Act under paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025
- Attempting to let a property for a fixed term under section 16E of the Housing Act 1988
- Attempting to end a tenancy orally or by service of a notice to quit under section 16E of the Housing Act 1988
- Serving an eviction notice that attempts to end a tenancy outside the prescribed section 8 process under section 16E of the Housing Act 1988
- Relying on a ground where the person does not reasonably believe that the landlord is/will be able to obtain possession under section 16E of the Housing Act 1988

- Relying on a ground knowing the landlord would not be able to obtain possession or being reckless as to whether they would under section 16J of the Housing Act 1988
- Failing to provide a tenant with prior notice that a ground which requires it may be used under section 16E of the Housing Act 1988
- Reletting or remarketing a property before expiry of the 12 month no-let period after using the moving and selling grounds under sections 16E and 16J of the Housing Act 1988
- Discriminating against prospective tenants during the letting process on the grounds that those tenants are in receipt of benefits or have children under sections 33 and 34 of the Renters Rights Act 2025
- Marketing a letting without stating the proposed rent under section 56 of the Renters Rights Act 2025
- Inviting or encouraging any person to offer to pay an amount of rent under the proposed letting that exceeds the stated rent under section 56 of the Renters Rights Act 2025
- Accepting an offer from any person to pay an amount of rent under the proposed letting that exceeds the stated rent under section 56 of the Renters Rights Act 2025

The Government has issued statutory guidance entitled “Civil penalties under the Renters' Rights Act 2025 and other housing legislation”. The Council has regard to this guidance in the exercise of their functions in respect of civil penalties. The Council has considered the following factors in developing this civil penalty policy to help ensure that the civil penalty is set at an appropriate level.

14.1 Persons Liable for Civil Penalties

Civil financial penalties may be imposed on any person who has committed a relevant breach or offence under the legislation outlined in this policy. In determining who is liable, the Council will consider the available evidence and identify the person or persons responsible for the breach or offence. Liability will be determined on a case-by-case basis and may include landlords, agents, licence holders, or other persons involved in the letting or management of residential accommodation. The following table provides a general guide to responsibility for common breaches and offences: -

Summary of Offence Responsibilities

Breach or Offence	Person(s) Liable
Rent to Rent arrangements	Landlord and/or superior landlord
Illegal eviction and harassment	Any person who has committed the offence
Assured tenancy duties (Renters Rights Act 2025)	Landlord or person acting on their behalf

Discrimination in breach of the Renters Rights Act 2025	Landlord or person acting on their behalf
Unlicensed HMOs	Person having control and/or person managing (section 263 Housing Act 2004)
Overcrowded HMOs	Person having control and/or person managing
Breach of HMO licence conditions	Licence holder
Breach of HMO Management Regulations	Person having control and/or person managing
Failure to comply with a statutory notice	Person on whom the notice was served
Smoke and Carbon Monoxide Regulations	Relevant landlord
Electrical Safety Regulations	Private landlord or registered provider

The table above is intended as a general guide only. The Council will determine liability based on the specific facts of each case. Where a breach or offence is committed by a body corporate, and it is shown to have been committed with the consent, participation or neglect of an officer of that body, the Council may impose a civil penalty on that individual as well as, or instead of, the corporate body.

Where more than one person is liable for the same breach or offence, the Council may impose a civil penalty on more than one person. The amount imposed on each person may differ depending on the circumstances of the case.

Once the Council has identified the appropriate person or persons against whom enforcement action should be taken, it will determine the level of any civil financial penalty in accordance with statutory guidance and this Policy. In doing so, the Council will have regard to a range of factors such as: -

- **Severity of the breach or offence.** The more serious the breach or offence, the higher the penalty should be.
- **Culpability and track record of the offender.** A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities.
- **The harm caused to the tenant.** This is a very important factor when determining the level of penalty. The greater the actual harm or the potential for harm, principally to the tenant but also potentially the local community, the higher the penalty should be.
- **Punishment of the offender.** The penalty should, in a way that is fair, both punish the offender and demonstrate the consequences of not complying with their responsibilities.

- **Deter the offender from repeating breaches or offences.** The ultimate goal is to prevent any further offending and help ensure that the offender fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a level that it is likely to have a very significant deterrent effect.
- **Deter others from committing similar breaches or offences.** While the fact that someone has received a civil penalty may not be in the public domain, the civil penalty policy itself will be and local authorities should consider how their formal enforcement activity can be effectively publicised. An important part of deterrence is the realisation on the part of landlords that the local housing authority is proactive in levying civil penalties where the need to do so exists and the civil penalty will be set at a high enough level such that operating lawfully will be the sensible financial choice.
- **Remove any financial benefit the offender may have obtained as a result of committing the breach or offence.** The principle here is that it should not be in the offender's financial interest to commit a breach or offence rather than comply, for example that the penalty for breaching licensing conditions in respect of occupancy of a property is less than the additional rent received as a result of the over-crowding. The absence of any financial benefit to the landlord does not mean though that the penalty should be reduced.

The factors set out above will be applied through the Council's civil penalties matrix to determine an appropriate starting point and any subsequent adjustments to the level of the penalty. The matrix provide a structured framework to promote consistency, but does not remove the Council's discretion to depart from starting points where justified by the particular circumstances of a case, subject to statutory limits and guidance. Once the level of the civil financial penalty has been determined, the Council will apply the relevant statutory process for imposing the penalty.

14.2.1 Statutory requirements for Imposing Civil Penalties

The table below sets out the statutory requirements applicable to different civil penalty regimes. It is intended as a general guide only. The Council will ensure that all enforcement action is taken in accordance with the specific statutory provisions applicable to each case, including any requirements relating to notices, representations, appeals and publication.

Legislation	Relevant Provision	Notice of Intent Required?	Publication / Transparency
Housing and Planning Act 2016	Civil penalties (including banning order breaches)	Yes – Notice of Intent must be served before imposing a civil penalty	Details may be recorded on the Rogue Landlord Database (where applicable)

Housing Act 2004	Civil penalties under s.249A	Yes – Notice of Intent required before imposing a civil penalty	Publication at the Council’s discretion and/or on relevant databases
Protection from Eviction Act 1977	Illegal eviction and harassment (civil penalty alternative)	Yes – where a civil penalty is imposed instead of prosecution	Publication discretionary via Council reporting or enforcement transparency
Renters’ Rights Act 2025	Civil penalty provisions	Yes – Notice of Intent required	Publication may include national PRS database and Council transparency reporting
Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015	Regulations 33–42	No – Compliance Notice issued first	Publication on PRS Exemptions Register
Electrical Safety Standards Regulations 2020	Regulations 3–11	Yes – following Remedial Notice	Publication discretionary
Smoke and Carbon Monoxide Alarm Regulations 2015	Regulations 5–8	No – Remedial Notice precedes penalty	Statement of Principles must be published
Consumer Rights Act 2015	Letting agent transparency	Yes	No statutory publication requirement

14.2.2 Civil Penalties Matrix

In determining the level of a civil penalty, officers will have regard to the matrix set out in Appendix 1 and the following sequential steps: -

1. Determining the starting point based on the seriousness of the breach or offence.
2. Adjustment for factors relating to the type of landlord; size and type of portfolio controlled, owned or managed; experience of the landlord (“Landlord Type”)
3. Mitigating and aggravating factors the Council deems significant including, but not limited to, factors relating to the track record and culpability of the landlord and the actual or potential harm to the occupants.
4. Financial considerations.
5. Applying the totality principle.

Where legislation requires the Council to publish a separate statement of principles for determining penalty charges, including the Smoke and Carbon Monoxide Alarm (England) Regulations 2015 (as amended) and the Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015, the offence-specific factors and starting points set out in the relevant appendix will apply in place of those in Appendix 1. In all other respects, the methodology set out in this policy, including landlord-type adjustments, financial consideration and the totality principle, will continue to apply.

Where a civil financial penalty is imposed in respect of an offence under section 234(3) of the Housing Act 2004 (failure to comply with HMO Management Regulations), or section 72(3) of the Housing Act 2004 (breach of licence conditions), the offence-specific duties, factors and starting points set out in Appendix 1 will apply. The Council will determine whether a separate civil penalty is appropriate for each breached regulation or licence condition having regard to the facts of the case, statutory guidance, and the totality principle.

Starting point based of seriousness of the breach or offence

The Ministry of Housing, Communities & Local Government has provided statutory guidance that prescribes starting points for all breaches and offences based on the seriousness of the breach or offence. Where the Council has determined its own starting points for specific offences, including breaches of licence conditions under sections 72(3) and 95(2) of the Housing Act 2004, these are set out in the relevant matrices appended to this policy.

Adjustment for factors relating to the type of landlord; size and type of portfolio controlled, owned or managed; experience of the landlord (“Landlord Type”)

While all landlords are expected to comply fully with their legal obligations, the Council considers that a higher standard of professionalism and regulatory awareness is reasonably expected of landlords who operate at greater scale, who have greater experience, or who are involved in more complex forms of letting. Where such landlords fail to comply with their obligations, this will ordinarily justify a higher civil penalty. In particular, a higher degree of professionalism is expected of landlords who:

- Control, own, or manage a significant portfolio of properties
- Have significant experience in the letting or management of property
- Are or have been involved in the letting or management of Houses in Multiple Occupation (HMOs)
- Are corporate landlords, or
- Are or have been directors of corporate landlords

An upward adjustment of 20% of the applicable starting point will be applied where the landlord meets any one or more of the following criteria: -

- The landlord has, at any point in time, controlled, owned, or managed six or more properties. These properties need not have been held concurrently or at the time civil penalty proceedings are brought
- The landlord has, at any point in time, controlled, owned, or managed three or more properties that operated as HMOs, whether or not concurrently
- The landlord is, or has previously been, a director of a corporate landlord
- The landlord is a corporate landlord
- The landlord has, in the Council's assessment and by reference to the available evidence, significant experience in the letting or management of property.

A downward adjustment of 20% of the applicable starting point will be applied only where all of the following criteria are met: -

- The landlord has, at any point in time, controlled, owned, or managed no more than two properties
- The landlord has controlled, owned, or managed no more than one property that has operated as an HMO, at any point in time
- The landlord has, in the Council's assessment and by reference to the available evidence, very limited experience in the letting or management of property

Mitigating and aggravating factors the Council deems significant including, but not limited to, factors relating to the track record and culpability of the landlord and the actual or potential harm to the occupants

To promote fairness and consistency in the administration of civil penalties, the Council will apply a structured and consistent framework when determining the extent to which mitigating and aggravating factors affect the quantum of any civil penalty.

14.2.2 General approach

Each breach or offence may have offence-specific mitigating and/or aggravating factors, which will be considered alongside the generic factors set out below. Where multiple civil penalties are issued under this policy against the same landlord at the same time, and except where expressly stated otherwise, mitigating and aggravating factors will be considered and applied separately to each civil penalty when determining the quantum of each penalty.

Mitigating factors

The Council may reduce the level of a civil penalty by up to 20% of the applicable starting point to reflect the presence of mitigating factors. Only in exceptional circumstances may the Council depart from the application of this policy in respect of mitigating factors and apply a reduction in excess of 20%. Exceptional circumstances

are rare and unusual and are not established merely by the presence of multiple mitigating factors.

Within the framework of this policy, the Council has not sought to provide an exhaustive list of mitigating factors, recognising that a wide range of circumstances may potentially give rise to mitigation. However, the following generic mitigating factors will be considered in respect of each breach or offence: -

Steps taken to remedy the basis of the breach or offence

Non-exhaustive examples include: -

- Promptly remedying all elements of the breach or offence after receiving communication from the Council.
- Promptly remedying all the significant elements of the breach or offence leaving only less significant elements of the breach or offence.

A high level of cooperation

Non-exhaustive examples include:

- Proactive provision of significant information the Council reasonably considers relevant beyond that required by statutory notice.

Acceptance of liability

Non-exhaustive examples include: -

- Accepting liability before or within the period for representations.

Where a landlord relies on a reasonable excuse defence or otherwise contests liability, this mitigating factor will not usually apply.

Health circumstances

Non-exhaustive examples include:

- A serious health condition or medical incident experienced by the landlord during, or in the period immediately preceding, the breach or offence, where there is clear and reliable evidence that the condition had a direct and material impact on the landlord's ability to comply with the relevant legal obligation. Examples may include, but are not limited to, a heart attack, stroke, cancer diagnosis, or other acute or serious medical event causing significant incapacity or impairment.

Diminished culpability (limited responsibility)

Non-exhaustive examples include: -

- A joint landlord who has evidenced that compliance arrangements for the subject property were directed and controlled by another joint landlord, and not by them.
- A landlord who became involved only after an unforeseen change in circumstances (such as the death of the previous landlord) and who committed the breach or offence only for a limited period while putting their affairs in order.

The instruction of a managing or letting agent, or reliance on an agent's actions or omissions, will not of itself constitute diminished culpability.

Aggravating factors

The Council may increase the level of a civil penalty by up to 20% of the applicable starting point to reflect the presence of aggravating factors. Only in exceptional circumstances may the Council depart from the application of this policy in respect of aggravating factors and apply an increase in excess of 20%. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple aggravating factors. The following generic aggravating factors will be considered in respect of each breach or offence: -

Previous history of non-compliance.

Non-exhaustive examples include: -

- Previous successful prosecutions (including relevant spent convictions), previous civil penalties, previous rent repayment orders, previous works in default, previous simple cautions.

Concurrent investigations or proceedings relating to other civil penalties, prosecutions, or rent repayment orders will not be treated as previous non-compliance.

Non-cooperation with the Council.

Non-exhaustive examples include: -

- Failure to comply with notices issued under section 16 of the Local Government (Miscellaneous Provisions) Act 1976, section 235 of the Housing Act 2004, or section 114 of the Renters Rights Act 2025.
- Failing to provide a substantive response to a letter of alleged offence.
- Failing to attend previously agreed meetings.

Where the Council considers that steps have been taken to avoid payment or enforcement (including asset transfer, company dissolution, or re-structuring), this

may be treated as an aggravating factor and pursued through appropriate legal routes. Where the Council has prosecuted, or is pursuing a prosecution, in respect of the same act or omission involving failure to provide legally required information (including failure to comply with a statutory notice), that conduct will not also be treated as an aggravating factor for the purposes of setting the civil penalty, in order to avoid double counting. Where multiple civil penalties are imposed against the same landlord at the same time, this aggravating factor will be applied only to the civil penalty with the highest starting point, unless there is a clear and reasoned basis for applying it differently.

Deliberate intent or negligence when committing the offence.

Non-exhaustive examples include: -

- Knowledge that the breach or offence was occurring.
- Continuation of offending after communication from the Council.
- Premeditation or planning, including steps taken to prevent detection or effective investigation.
- Providing false or misleading information to the Council.
- Applying pressure to occupants to deter cooperation with the Council.

The number of occupants affected.

Non-exhaustive examples include: -

- 3-5 occupants affected.

Duration of non-compliance.

Non-exhaustive examples include: -

- The offence or breach occurred over a 3–6 month period.

Vulnerability of occupants

Non-exhaustive examples include children and young adults, persons vulnerable by reason of age, disability or sensory impairment, persons with drug or alcohol dependency, victims of domestic abuse, children in care, persons with complex health needs, persons who do not speak English as a first language, victims of trafficking or sexual exploitation, refugees, asylum seekers, and pregnant women.

14.2.3 Financial considerations

The Council will review the quantum of the civil penalty and consider whether it is sufficient to act as an effective deterrent to future non-compliance. Where the Council has evidence that it considers to be sufficiently reliable regarding rental income and/or

asset value from the landlord's, it may determine that an increase in the level of the penalty is appropriate in order to achieve effective deterrence. It is essential that, as an absolute minimum, landlords do not financially benefit from their offending behaviour.

Financial circumstances will ordinarily be considered after any written representations have been received and as part of the determination of any final notice. Where a landlord seeks to rely on a strained or limited financial position as a basis for reducing the level of a civil penalty, that position must be supported by appropriate and verifiable evidence sufficient to enable the Council to assess the landlord's financial position consistently, objectively, and transparently. A distinction will be drawn between evidenced financial hardship and deliberate or strategic non-payment. A claimed inability to pay will not prevent enforcement or recovery action where the Council is satisfied that non-payment is avoidable or part of a pattern of non-compliance.

Unsupported assertions, partial disclosure, or selective provision of information will not be given weight. At a minimum, and where such information exists, the following should be provided as part of any written representations: -

- The last three full tax years full self-assessment tax returns filed with HMRC, including all additional and supplemental pages
- The last three full tax years SA302 documents & tax year overviews
- The last three months payslips
- The last three years P60 certificates
- The last twelve months Universal Credit payment statements
- A list of all property assets owned or jointly owned (not limited to rental properties), together with corresponding Land Registry title documents
- A list of all property assets owned, or held on a long lease, by any corporate entity in which the landlord has a beneficial interest, together with corresponding Land Registry documentation
- The most recent annual mortgage statement for each property, or the last twelve months mortgage statements where the mortgage has been in place for less than twelve months
- Valuation statements for all ISAs held
- Statements from any cryptoasset exchange accounts showing balances and valuations
- A list of all shareholdings
- Recent bank statements for any account holding a balance in excess of £5,000
- Recent statements for all secured and unsecured loans
- Bankruptcy orders and official notifications of bankruptcy

Where the Council is not satisfied that it has been provided with sufficiently reliable, complete, and accurate information to assess the landlord's financial position, the

Council may draw the inference that the landlord is able to pay the civil penalty as imposed.

A claimed inability to pay will not, of itself, outweigh the need to ensure effective deterrence or to remove any financial benefit obtained as a result of the breach or offence.

14.2.4 The Totality Principle

The Council will have regard to the totality principle to ensure that the overall outcome of its enforcement action is just and proportionate. In exceptional cases and having regard to the particular circumstances of the case, the Council may take account of totality at an earlier stage by deciding not to pursue a civil penalty in respect of a specific breach or offence where doing so would render the overall outcome disproportionate.

In general, however, the application of the totality principle will form the final step in the Council's decision-making process, undertaken after any written representations have been considered and before final notices are issued, once the level of each individual civil penalty has been assessed in accordance with this policy.

As a final step before issuing final notices, the Council will consider whether multiple civil penalties being imposed under this policy against the same landlord at the same time result in an aggregate amount that is just and proportionate. Where the Council concludes that the aggregate amount would not be just and proportionate, it will consider whether a proportionate reduction of the penalties is appropriate.

The totality principle does not operate across different legal persons who are separately liable in law, nor does it operate across civil penalties imposed at different times. In general, it applies only to multiple civil penalties imposed under this policy on the same person at the same time. Where, however, legislation provides that an officer of a body corporate, or a person concerned in its management, may be separately liable in relation to the same conduct as the body corporate, and that officer also holds a shareholding interest in the body corporate, the Council will, where civil penalties are imposed at the same time on both the body corporate and the officer arising from that same conduct, consider whether the combined outcome results in punitive duplication and is therefore not just and proportionate.

Where a reduction is applied under the totality principle, the Council will ordinarily do so by applying a uniform percentage reduction across all relevant civil penalties being issued at the same time, being those civil penalties that form part of the same totality assessment. Where, however, the application of the totality principle is required to address punitive duplication arising from a shared economic interest between a body

corporate and an officer, the Council may apply a differential adjustment to ensure that the overall outcome is just and proportionate.

This approach reflects the statutory guidance on the application of the totality principle and is intended to promote consistency, transparency, and proportionality, while avoiding arbitrary or selective adjustment of individual penalties.

In accordance with the statutory guidance, any rent repayment orders made in respect of the same breach or offence will be disregarded for the purposes of assessing the totality of civil penalties under this policy.

14.2.5 Process for imposing a civil penalty and the right to make written representations

Notice of intent

Before imposing a civil penalty on a landlord, the Council will give the landlord a notice of intent. The notice of intent will set out: -

- The amount of the proposed civil penalty
- The reasons for proposing to impose the civil penalty
- Information about their right to make written representations

Right to make written representations

A landlord who is given a notice of intent may make written representations to the Council about the proposal to impose a civil penalty. Any representations must be made within a period of 28 days beginning with the day after the date on which the notice of intent was given.

Decision after the representations period

After the end of the period for representations the Council will: -

- Decide whether to impose a civil penalty on the landlord, and
- If it decides to impose a civil penalty, decide the amount of the penalty. This amount can be higher or lower than the amount stated in the notice of intent.

A landlord's rectification of the identified breach or offence during the representations period will rarely, of itself, lead the Council to conclude that the imposition of a civil penalty is inappropriate. However, compliance at that stage will usually be relevant to the assessment of mitigating factors that may reduce the level of any civil penalty imposed.

Similarly, an admission of liability will rarely, of itself, lead the Council to conclude that the imposition of a civil penalty is inappropriate. An admission of liability will, however, usually be relevant to the assessment of mitigating factors that may reduce the level of any civil penalty imposed.

Final notice

If, following the receipt of written representations and/or the expiry of the time period to make written representations, the Council decides to impose a civil penalty on the landlord, it will give the landlord a final notice imposing that penalty. The final notice will set out: -

- The amount of the civil penalty
- The reasons for imposing the penalty
- Information about how to pay the penalty
- Explain the consequences of non-payment and the Council's powers to recover unpaid civil financial penalties.
- The period for payment of the penalty
- Information about rights of appeal
- The consequences of failure to comply with the notice

Discount for prompt payment

Where a civil penalty imposed by a final notice is paid in full within the period specified in that notice (normally 28 days beginning with the day after the final notice is given), the Council will apply a discount of 15% to the amount of the civil penalty.

The availability of the discount is conditional upon full payment being received within the specified period. The discount period will not be extended or suspended by the bringing of an appeal. A landlord who chooses to appeal may still benefit from the discount by paying the civil penalty in full within the specified period; however, where payment is not made within that period, the discount will not apply. The application of any prompt payment discount will be subject to internal approval and financial governance procedures.

Illustrative example of the application of the discount

The landlord of an HMO property fails to obtain a licence. They only operate two HMO properties and there are no other relevant factors or aggravating features. The starting point for the offence under the Council's civil penalties matrix is £17,000.

Following the issue of a notice of intent proposing a civil penalty of £17,000, the landlord makes written representations. Having considered those representations, the Council determines to impose a civil penalty of £16,000, as set out in the final notice. If the landlord pays the civil penalty in full within the payment period specified in the final notice, a 15% prompt payment discount is applied, resulting in a discounted payment of £13,600.

Appeals

Where an appeal is brought, the final notice is suspended in accordance with legislation. Where no appeal is brought, payment remains due in accordance with the final notice and recovery action may commence after the payment period expires.

A landlord who is given a final notice may appeal to the First-tier Tribunal (Property Chamber) against the decision to impose a civil penalty and/or the amount of the civil penalty. Any appeal must be made within 28 days beginning with the day after the date on which the final notice was given. Where an appeal is brought, the final notice is suspended until the appeal is finally determined or withdrawn.

An appeal to the First-tier Tribunal is by way of a re-hearing of the Council's decision. In determining an appeal, the Tribunal may have regard to matters of which the Council was unaware at the time the decision to impose the civil penalty was made. The Tribunal may dismiss an appeal if it is satisfied that the appeal is frivolous, vexatious, an abuse of process, or has no reasonable prospect of success.

The First-tier Tribunal may invite the parties to consider mediation or another form of alternative dispute resolution. The Council will not generally agree to mediation in relation to the level of a civil penalty, as civil penalties are determined by reference to this Policy to promote fair, consistent, and proportionate outcomes. Agreeing reductions outside the Policy framework would risk undermining consistency and the Council's enforcement objectives.

On determination of an appeal, the Tribunal may: -

- Confirm the civil penalty
- Vary the amount of the civil penalty (whether by increase or reduction)
- Cancel the civil penalty

Where the Tribunal varies a civil penalty by increasing its amount, it may do so only up to the applicable statutory maximum for the relevant breach or offence (£7,000 or £40,000, as applicable). A party to the appeal may apply for permission to appeal the decision of the First-tier Tribunal to the Upper Tribunal (Lands Chamber).

14.3 Rent Repayment Orders

Part 2 of the Housing and Planning Act 2016 permits the Council to seek a Rent Repayment Order at the First Tier Tribunal Property Chamber to require the landlord of the property where the offence(s) has been committed to refund rent to the tenants or the Council. S48 of the Housing and Planning Act 2016 places a duty on the Council to consider applying for Rent Repayment Orders.

Where a landlord has been convicted or received a Civil Financial Penalty in respect of the offence, the Tribunal must award the maximum applicable amount, except in exceptional circumstances.

This power will be considered in response to all qualifying offences and where there is sufficient evidence for a successful application to the First Tier Tribunal. The qualifying offences are: -

- Unlawful eviction and harassment of occupier as defined under the Protection from Eviction Act 1997
- Failure to comply with an Improvement Notice [s30 Housing Act 2004]
- Offences in relation to unlicensed HMOs [s72(1) Housing Act 2004]
- Offences in relation to unlicensed houses [s95(1) Housing Act 2004]
- Failure to comply with an Improvement Notice [s30(1) Housing Act 2004]
- Failure to comply with a Prohibition Order [s32(1) Housing Act 2004]
- Breach of a Banning Order [s21 Housing and Planning Act 2016]
- Using Violence to secure entry [s6(1) Criminal Law Act 1977]
- Knowingly or recklessly misusing a possession ground [s16J(1) Housing Act 1988]
- Letting or marketing of a property within twelve months of using the 'moving in' or 'selling' ground of eviction [s16J(2) Housing Act 1988]
- Continuous breach of certain tenancy reform requirements [s16J(3) Housing Act 1988]

An application for an RRO may be in addition to other formal action, such as prosecution proceedings or the imposition of a Civil Penalty. Where the Council has issued a Civil Financial Penalty or pursued prosecution, it will usually apply for a Rent Repayment Order where public funds have been paid to a landlord who has committed a qualifying offence.

S49 of the Housing and Planning Act 2016 enables the Council to assist tenants in applying for Rent Repayment Orders. The Council will usually assist tenants by referring or signposting them to a relevant organisation. An application for a Rent Repayment Order may be made in addition to, or alongside, other enforcement action where legislation permits.

14.4 Simple Cautions

A simple caution may be used as an alternative to prosecution in appropriate cases where: -

- there is sufficient evidence to provide a realistic prospect of conviction;
- the offender admits the offence; and
- the offender agrees to accept a caution.

Simple cautions will generally be considered where offences are less serious and where it is proportionate to do so, having regard to the circumstances of the case. A record of a simple caution may be taken into account in any future enforcement action. Where an offender declines to accept a simple caution, the Council will normally consider prosecution.

14.5 Banning Orders

Part 2, Chapter 2 of the Housing and Planning Act 2016 permits a Council to apply for a Banning Order against a person who has been convicted of one or more of the relevant offences. This would prevent the landlord from:

- Letting housing in England
- Engaging in English letting agency work
- Engaging in English property management work
- Doing two or more of those things

The Council may consider a Banning Order for the more serious offenders. It will take into account the seriousness of the offence(s), whether the landlord has committed other offences (or received any Civil Penalty in relation to a Banning Order offence) and any history of failing to comply with their obligations or legal responsibilities. It will also take into account other relevant factors, including but not limited to: -

- The harm, or potential harm, caused to the tenant
- The need to punish the offender
- The need to deter the offender from repeating the offence
- The need to deter others from committing similar offences

Persistent non-compliance, including failure to pay civil financial penalties or comply with enforcement outcomes, may form part of the evidence considered when determining whether an application for a banning order is appropriate.

15. Costs and Charges

The Council incurs costs in carrying out its functions. Where legislation allows, the Council will seek to recover reasonable costs and expenses associated with its enforcement, licensing and wider regulatory activity. This may include (non-exhaustively) costs arising from inspections, investigation, evidence gathering, notices and other statutory documentation, follow-up action, compliance monitoring, and works or other interventions. Further detail on the recovery of unpaid civil financial penalties is set out at section 16 of this policy.

Recovery may be pursued using all available lawful routes, which may include civil action, local land charges, and enforcement against the property. Where permitted by legislation, interest may be applied to outstanding sums until paid.

16. Recovery of Unpaid Civil Financial Penalties

Where a civil financial penalty remains unpaid following the expiry of the period for payment specified in the final notice, and where no appeal is outstanding, the penalty may be recovered by the Council as a civil debt. The Council will actively pursue the recovery of unpaid civil financial penalties where it is lawful, proportionate and appropriate to do so. Recovery action is an important element of ensuring effective enforcement and maintaining public confidence in the Council's regulatory role.

The method of recovery pursued in any individual case will be determined having regard to the value of the debt, the conduct of the debtor, any history of non-payment or non-compliance, vulnerability considerations, and what is reasonable and proportionate in the circumstances.

16.1 Ways to Enforce the Debt

Potential routes to recover an unpaid civil financial penalty include (but are not limited to): -

- **Warrant or writ of control**
This authorises court enforcement agents to take control of goods from the debtor's home or business to satisfy the judgment debt.
- **Attachment of earnings order**
This allows deductions to be made directly from the debtor's earnings by their employer and paid to the Council.
- **Third party debt order**
This enables money held in a debtor's bank or building society account to be frozen and paid to the Council to satisfy the debt.
- **Charging order**
This secures the debt against an asset (usually a property), preventing its sale without payment of the outstanding amount and potentially enabling the Council to seek an order for sale.
- **Bankruptcy proceedings**
This may be pursued where the statutory threshold is met (currently £5,000), enabling a trustee-in-bankruptcy to realise assets and distribute funds to creditors in accordance with insolvency law.

16.2 Costs and Interest

Where permitted by law, the Council may seek to recover reasonable court fees, enforcement costs, and associated expenses incurred in the recovery of unpaid civil financial penalties. Interest may also be applied to outstanding sums until paid.

16.3 Relationship to Wider Enforcement Action

Failure to pay a civil financial penalty may be regarded as evidence of ongoing non-compliance and may be taken into account in future enforcement decisions, including but not limited to decisions to prosecute, to impose further civil penalties, to refuse or revoke licences, or to consider banning order proceedings where the statutory criteria are met.

16.4 Governance and Write-Off

Any decision not to pursue, or to discontinue, recovery action will be taken in accordance with the Council's financial regulations and governance arrangements and will be properly recorded with reasons. Decisions to pursue enforcement beyond initial recovery action, or to commence insolvency proceedings, will be taken or endorsed by a senior officer in accordance with the Council's scheme of delegation.

17. Joint Working and Information Sharing

The Council recognises that effective regulation of the private rented sector requires a coordinated and multi-agency approach. Many cases involve overlapping issues, including housing conditions, tenancy rights, safeguarding, financial exploitation, and criminal behaviour. The Private Sector Housing Team will work in partnership with a range of internal and external agencies to ensure that risks to tenants are identified at the earliest opportunity and addressed through appropriate and proportionate intervention. The Council may work jointly with other agencies including (this list is not exhaustive): -

- Hereford and Worcester Fire and Rescue Service
- Police
- Planning and Building Control
- Worcestershire Regulatory Services
- Trading Standards
- Home Office
- Worcestershire County Council

17.1 Internal Collaboration

The Council will work closely across internal services to ensure a joined-up approach to prevention and enforcement, including: -

- Housing Options and Homelessness Services - To support early intervention, prevent homelessness, and ensure effective case handover where enforcement action may be required.

- Legal Services - To support the use of formal enforcement powers, including civil penalties, prosecutions, and injunctions.
- Customer Services and Revenues and Benefits - To support intelligence gathering, identify vulnerable households, and ensure coordinated responses to tenant concerns.

17.2 External Partnership Working

The Council will work collaboratively with external partners to address risks within the private rented sector, including:

- Police - In relation to criminal matters such as unlawful eviction, harassment, violence, or organised criminal activity.
- Fire and Rescue Authority -To address fire safety risks, including Houses in Multiple Occupation (HMOs), means of escape, and fire protection measures.
- Worcestershire Regulatory Services (WRS) - In relation to environmental protection, statutory nuisance, public health, and wider regulatory functions.
- Trading Standards -In relation to unfair trading practices, letting agent regulation, and financial or consumer protection issues affecting tenants.

17.3 Letting Agents and Property Agent Regulation

The Council recognises that the regulation of letting agents and property managers forms an important part of protecting tenants within the private rented sector. The legislative framework includes the Consumer Rights Act 2015, the Tenant Fees Act 2019, and associated requirements relating to client money protection and redress schemes. Enforcement responsibilities in this area are shared across regulatory services. The Private Sector Housing Team will identify potential breaches through inspections, complaints, and casework, and will work collaboratively with Trading Standards and other partners to ensure appropriate enforcement action is taken.

17.4 Coordinated Enforcement Approach

The Council will adopt a coordinated and intelligence-led approach to enforcement, including:

- sharing information lawfully between partners
- undertaking joint inspections where appropriate
- coordinating enforcement action across agencies
- ensuring clear referral pathways between services
- prioritising cases involving vulnerable households or serious risk.

This approach ensures that enforcement action is effective, proportionate, and targeted at the most serious and high-risk cases.

17.5 Safeguarding and Vulnerability

The Council recognises that many cases involve vulnerable individuals or households at risk of harm. Officers will work with safeguarding partners and relevant agencies to ensure that appropriate support is provided alongside any enforcement action. Joint

working arrangements applied in relation to unauthorised encampments are addressed in Section 9.4.9 of this policy.

18. Monitoring of Enforcement Activity

The Council will monitor the use of its housing enforcement powers to ensure enforcement activity is lawful, proportionate, consistent and effective. Information may be recorded and reviewed relating to:

- Inspections and investigations undertaken
- Statutory notices served
- Civil financial penalties issued
- Prosecutions and legal proceedings
- Works in default undertaken
- Rent repayment orders and banning orders pursued
- Enforcement activity undertaken under the Renters Rights Act 2025, including any statutory reporting requirements or Government data returns.
- Recovery action taken in respect of unpaid civil financial penalties, including outcomes and sums recovered.

This information will be used to: -

- Review enforcement practices
- Identify emerging risks within the private rented sector
- Inform future housing policy and regulatory activity
- Ensure consistency and fairness in enforcement decisions.

Summary information may be reported through internal governance processes or published, where appropriate and in accordance with transparency requirements. The Council may publish anonymised or summary information relating to enforcement activity, including civil penalties imposed and recovery outcomes, where lawful and appropriate.

19. Communication and Training

This Policy will be made publicly available and will be communicated to relevant stakeholders. The Council will: -

- ensure that authorised officers receive appropriate training in housing enforcement and relevant legislation;
- provide internal guidance, procedures and templates to support consistent application of this Policy; and
- engage with landlords, agents and partner organisations where appropriate to promote compliance and awareness of legal requirements.

20. Complaints

Contact may be made with the Council about any matters listed here by email at pshteam@bromsgroveandredditch.gov.uk or by post at: -Redditch Town Hall, Walter Stranz Square, Redditch, Worcestershire, B98 8AH

A service user can still make a complaint in cases where the Council has instigated legal proceedings. However, making a complaint will not stop any impending legal action. Where statutory notices have been served, making a complaint does not replace the statutory rights of appeal or the right to make representations. It also does not allow extra time to comply with any notice or order. If a service user disagrees with a statutory notice, they should take action as specified in the notice or order to make an appeal, if any exists. Reference should be made to any notes that may accompany the notice or order for more detail.

21. Policy Review

This policy will normally be reviewed every five years, or sooner where there are significant legislative, regulatory or operational changes.

Version Control

Title		Enforcement and Civil Penalties Policy		
Description		Private Sector Housing Policy		
Created by		Miss Katie Sharp-Fisher Private Sector Housing Manager		
Date created		June 2026		
Maintained by		Private Sector Housing		
Next Review Date		June 2030		
Version number	Modified by	Modifications made	Date modified	Status

Appendix 1 – Civil Penalties Tables

1. Purpose of this Appendix

This appendix provides an indicative framework to support the Council in determining the level of civil penalty for relevant housing offences under:

- Housing Act 2004
- Housing Act 1988
- Protection from Eviction Act 1977
- Housing and Planning Act 2016
- Renters' Rights Act 2025
- Electrical Safety Regulations

This matrix must be applied alongside the main Enforcement Policy, including the Council's approach to:

- culpability
- harm
- proportionality
- deterrence

2. Landlord Adjustment (Applied Across All Offences)

The ranges within this table reflect indicative adjustments: -

- **Downward adjustment (up to –20%)** may apply where:
 - First offence
 - Small-scale landlord
 - Evidence of cooperation or engagement
- **Upward adjustment (up to +20%)** may apply where:
 - Portfolio or professional landlord
 - Previous enforcement history
 - Deliberate or reckless conduct

Officers must exercise discretion. The figures shown are indicative and must not be applied mechanically.

3. General Principles

- “No specific factors identified” means no additional factors beyond the Council's standard policy framework apply
- Where multiple offences arise, penalties may be considered individually or in combination
- Where offences are particularly serious, the Council may consider prosecution as an alternative to a civil penalty

Appendix 1

Matrix Tables

1. Protection from Eviction Act 1977

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Unlawful eviction and harassment of occupier - section 1 of the Protection from Eviction Act 1977	£35,000	£40,000	£28,000	£42,000	No specific factors identified.	<ul style="list-style-type: none"> • Violence or threats of violence. • Disposal of possessions or threats to dispose of possessions. • Breach or evasion of an injunction or undertaking. • Loss of home.

2. Housing Act 1988 breaches and offences

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Failure to give a written statement of terms and any other prescribed information - section 16D of the Housing Act 1988	£4,000	£7,000	£3,200	£4,800	Provision of some of the required terms and prescribed information within the required period.	No specific factors identified
Attempting to let a property for a fixed term - section 16E(1)(a) of the Housing Act 1988	£4,000	£7,000	£3,200	£4,800	No specific factors identified.	No specific factors identified beyond the standard policy framework.
Attempting to end a tenancy by service of a notice to quit - section 16E(1)(b) of the Housing Act 1988	£6,000	£7,000	£4,800	£7,200	No specific factors identified.	Tenant vacates property within four months of the date of vacation or equivalent specified in the notice to quit.
Attempting to end a tenancy orally or requiring that it is ended orally - section 16E(1)(c) of the Housing Act 1988	£6,000	£7,000	£4,800	£7,200	No specific factors identified.	Tenant vacates property within four months of the date of vacation or equivalent specified in the notice to quit.
Serving a possession notice that attempts to end a tenancy outside the prescribed section	£6,000	£7,000	£4,800	£7,200	No specific factors identified	Tenant vacates property within four months of the date of

8 process - section 16E(1)(d) of the Housing Act 1988						vacation or equivalent specified in the notice to quit.
Relying on a ground where the person does not reasonably believe that the landlord is, will, or may be able to obtain possession on that ground and the tenant(s) surrendered the tenancy within the period of four months beginning with the date of the contravention, without an order for possession of the dwelling-house being made - section 16E(1)(e) of the Housing Act 1988	£6,000	£7,000	£4,800	£7,200	No specific factors identified	No specific factors identified
Failing to provide a tenant with prior notice that a ground which requires it may be used - section 16E(1)(f) of the Housing Act 1988	£3,000	£7,000	£2,400	£3,600	No specific factors identified.	No specific factors identified
Failure to give an existing tenant prescribed information about changes made by the Renters' Rights Act 2025 in the prescribed form and timeframe - paragraph 7(2) of schedule 6 to the Renters' Rights Act 2025	£4,000	£7,000	£3,200	£4,800	Provision of some of the required prescribed information within the required period. Provision of prescribed information but not in the prescribed form.	No specific factors identified
Continuation of conduct subject to a relevant penalty (under s.16I or s.16K Housing Act 1988) after the 28-day period (or, if appealed, after conclusion of the appeal) where the final notice has not been withdrawn — section 16J(3) of the Housing Act 1988	Double the starting level for the two constituent breaches added together	£40,000	Dependent on the constituent breaches	Dependent on the constituent breaches	No specific factors identified.	No specific factors identified
Conduct giving rise to liability under s.16I, where within the preceding five years the person has either (i) had a relevant penalty (under s.16I or s.16K Housing Act 1988) imposed for different conduct and the final notice has not been withdrawn, or (ii) been convicted under s.16J for different conduct – section 16(J)(4) of the Housing Act 1988	Double the starting level for the two constituent breaches added together	£40,000	Dependent on the constituent breaches	Dependent on the constituent breaches	Dependent on the most recent conduct giving rise to liability to a civil penalty under section 16I of the Housing Act 1988.	Dependent on the most recent conduct giving rise to liability to a civil penalty under section 16I of the Housing Act 1988.
Relying on a ground where the person knows that the landlord would not be able to obtain an order for possession on that ground, or being reckless as to whether the landlord would be able to do so and the	£30,000	£40,000	£24,000	£36,000	No specific factors identified	No specific factors identified

tenant(s) surrendered the tenancy within the period of four months beginning with the date the ground was relied on, without an order for possession of the dwelling-house being made – section 16J(1) of the Housing Act 1988						
Breach of restrictions relating to reletting (s16(E)(2) Housing Act 1988) or remarketing (s16(E)(3) Housing Act 1988) a property within restricted period after using Grounds 1 or 1A of Schedule 2 Housing Act 1988 - section 16J(2) of the Housing Act 1988	£25,000	£40,000	£20,000	£30,000	No specific factors identified.	No specific factors identified.

3. Renters Rights Act 2025

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Discrimination relating to children in the lettings process – section 33(1) of the Renters’ Rights Act 2025	£6,000	£7,000	£4,800	£7,200	No specific factors identified	No specific factors identified
Discrimination relating to benefits in the lettings process – section 34(1) of the Renters’ Rights Act 2025	£6,000	£7,000	£4,800	£7,200	No specific factors identified	No specific factors identified
Failure to specify proposed rent within a written advertisement or offer – section 56(2) of the Renters’ Rights Act 2025	£3,000	£7,000	£2,400	£3,600	No specific factors identified	No specific factors identified
Inviting, encouraging or accepting any offer of rent greater than the stated rate – section 56(3) of the Renters’ Rights Act 2025	£4,000	£7,000	£3,200	£4,800	No specific factors identified	No specific factors identified

4. Housing and Planning Act 2016

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Breach of a banning order - section 21(1) of the Housing and Planning Act 2016	£35,000	£40,000	£28,000	£42,000	A single, isolated incident	Concealment or evasion

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5. The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 breach of duties

Offence	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (3)(b), (3)(d), (3)(e). Regulation 3D: (a), (b), (c), (f)	£5,000	£40,000	£4,000	£6,000	The report or record evidences that the electrical installations were compliant at all points.	The number or nature or severity of the issues observed on the report or record.
Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (1)(a), (1)(b), (1)(c), (3)(a), (3)(c), (3)(ca), (5)(b), (5)(c). Regulation 3B: (1)(a), (1)(b), (1)(c). Regulation 3C: (1), (2)(a). Regulation 3D: (d), (e)	£12,500	£40,000	£10,000	£15,000	The report or record evidences that the electrical installations were compliant at all points.	The number or nature or severity of the issues observed on the report or record.
Failure to comply with The Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England) Regulations 2020 Regulation 3: (4), (5a), (6). Regulation 3C: (2)(b), (4)	£20,000	£40,000	£16,000	£24,000	No specific factors identified.	The number or nature or severity of the issues observed on the report or record.

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6. Housing Act 2004 offences

	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Failure to comply with an improvement notice - section 30(1) of the Housing Act 2004	£25,000	£40,000	£25,000	£30,000	The nature and extent of hazard(s) that are present once the deadline for compliance has passed. Whether the property is unoccupied once the deadline for compliance has passed.	The nature and extent of hazard(s) that are present once the deadline for compliance has passed.

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					Access to the property was prevented by the actions or refusal of the occupant(s) and a landlord can evidence that they took steps to obtain access to the property for the purpose of carrying out the required works, but those steps fell short of establishing a reasonable excuse for non-compliance.	
Failure to comply with an overcrowding notice - section 139(7) of the Housing Act 2004	£20,000	£40,000	£16,000	£24,000	No specific factors identified.	The level of overcrowding present.
Failure to obtain an HMO licence - section 72(1) of the Housing Act 2004	£17,000	£40,000	£13,600	£20,400	No specific factors identified	The landlord has knowledge or experience of licensing requirements. The condition of the unlicensed property.
Knowingly permitting over-occupation of an HMO - section 72(2) of the Housing Act 2004	£20,000	£40,000	£16,000	£24,000	There are suitable amenity and space provisions in the HMO.	The level of over-occupation present.

7. Failure to Comply with The Management of Houses in Multiple Occupation [England] Regulations 2006 and The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 – section 234(3) of the Housing Act 2004

	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
Duty of Manager to provide information to occupier	£3,000	£40,000	£2,400	£3,600	The nature and extent of offences within the specific regulation	The nature and extent of offences within the specific regulation The landlord has refused to provide any outstanding contact information more than 48 hours

						after it has been requested by an occupant or on behalf of an occupant.
Duty of manager to take safety measures	£20,000	£40,000	£16,000	£24,000	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty of manager to maintain water supply and drainage	£10,000	£40,000	£8,000	£12,000	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty of manager to supply and maintain gas and electricity	£12,000	£40,000	£9,600	£14,400	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty of manager to maintain common parts, fixtures, fittings and appliances	£7,000	£40,000	£5,600	£8,400	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty of manager to maintain living accommodation	£7,000	£40,000	£5,600	£8,400	The number, nature and extent of offences within the specific regulation	The number, nature and extent of offences within the specific regulation
Duty to provide waste disposal facilities	£7,000	£40,000	£5,600	£8,400	The number, nature and extent of offences within the specific regulation	The nature and extent of offences within the specific regulation The lack of sufficient refuse and/or litter containers either inside and/or outside the property has been previously reported The refuse and/or litter that requires disposal includes hazardous materials

8. Housing Act 2004 - Section 72(3) - Breach of licence conditions

	1 st Offence/ starting point	2 nd Offence (Statutory Maximum)	Landlord Type downward adjustment	Landlord Type upward adjustment	Offence-specific mitigating factors	Offence-specific aggravating factors:
<p>Failure to comply with licence conditions related to: -</p> <ul style="list-style-type: none"> • Signage or the provision of information for tenants • Provision of written terms of occupancy for tenants • 21 • Procedures regarding complaints • Procedures regarding vetting of incoming tenants • Compliance with deposit protection legislation • The recording and provision of information regarding rent payments • Procedures relating to rent collection • The provision of information regarding occupancy of the property • The provision of information regarding change of managers or licence holder details • The provision of information related to changes in the property • Requirements relating to the sale of the property • Attending training courses • Requirements to hold insurance • The provision of insurance documentation • The provision of or obtaining of suitable references • The provision of keys and alarm codes • Security provisions for access to the property • The provision of suitable means for occupiers to regulate temperature 	£4,000	£40,000	£3,200	£4,800	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach

<ul style="list-style-type: none"> Carrying out items on a schedule of works not otherwise mentioned in the HMO licence conditions section of this policy, relating to non-compliance with items on a schedule of works 						
<ul style="list-style-type: none"> Failure to comply with licence conditions related to: Procedures and actions regarding Inspections Procedures regarding Repair issues Maintenance and use of common parts (including gardens, outbuildings and property exterior) and living areas Safeguarding occupiers and minimising disruption during works The provision of information regarding alterations and construction works Procedures regarding emergency issues Waste and waste receptacles, pests, minor repairs, alterations or decoration. Giving written notice prior to entry Allowing access for inspections Minimising risk of water contamination The compliance of furnishings or furniture with fire safety regulations Carrying out items on a schedule of works in relation to provision of mechanical extraction or electrical sockets 	£7,000	£40,000	£5,600	£8,400	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach
<ul style="list-style-type: none"> Failure to comply with licence conditions related to: The provision of documentation regarding energy performance certificates, fire detection and prevention, emergency lighting, carbon monoxide detection, fire risk assessments, gas installations, electric installations and appliances Notification of legal proceedings, contraventions and other relevant information that may affect a fit and proper person status Procedures and actions regarding ASB 	£12,500	£40,000	£10,000	£15,000	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach

<ul style="list-style-type: none"> Carrying out items on a schedule of works in relation to the provision of personal hygiene facilities, kitchen facilities or heating 						
<ul style="list-style-type: none"> Failure to comply with licence conditions related to: <ul style="list-style-type: none"> Minimum floor areas Occupancy rates Occupancy of rooms or areas that are not to be used as sleeping accommodation Limits on number of households allowed to occupy the property or part of the property 	£20,000	£40,000	£16,000	£24,000	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach
<ul style="list-style-type: none"> Failure to comply with licence conditions related to: <ul style="list-style-type: none"> The condition or existence of smoke alarms, carbon monoxide alarms, emergency lighting, gas installations, electric installations and appliances, fire detection or other fire safety features or requirements The provision and maintenance of safe means of escape, including requirements to keep escape routes and exits free from obstruction Carrying out items on a schedule of works in relation to fire safety or the provision of a Carbon Monoxide detector 	£25,000	£40,000	£20,000	£30,000	The nature and extent of the licence condition breach	The nature and extent of the licence condition breach

Appendix 2

Statement of principles to determine the amount of a penalty charge under Part 4 of The Smoke and Carbon Monoxide Alarm (England) Regulations 2015 as amended by The Smoke and Carbon Monoxide Alarm (Amendment) Regulations 2022 (“the Regulations”)

Section 13 of the Regulations requires local housing authorities to prepare and publish a statement of principles which they propose to follow in determining the amount of a penalty charge.

The Regulations introduced legal requirements on relevant landlords to:

1. Equip a smoke alarm on each storey of the premises on which there is a room used wholly or partly as living accommodation.
2. During any period when the premises were occupied under the tenancy, to ensure that a carbon monoxide alarm is equipped in any room of the premises which is used wholly or partly as living accommodation and which contains fixed combustion appliance other than a gas cooker.
3. Carry out checks by or on behalf of the landlord to ensure that each prescribed alarm is in proper working order on the day the tenancy begins if it is a new tenancy.
4. Where, following a report made on or after 1st October 2022 by a tenant or by their nominated representative to the landlord, a prescribed alarm is found not to be in proper working order, the alarm is repaired or replaced.

For the purposes of the legislation, living accommodation includes a bathroom or lavatory.

Where the Council believe that a landlord is in breach of one or more of the above duties, the Council must serve a remedial notice on the landlord. The remedial notice is a notice served under Regulation 5 of the Regulations.

If the landlord then fails to take the remedial action specified in the notice within the specified timescale, the Council can require a landlord to pay a penalty charge and can arrange for remedial action to be taken under certain circumstances. The power to charge a penalty arises from Regulation 8 of the Regulations. Failure to comply with each remedial notice can lead to a fine of up to £5,000. Fines will be applied per breach, rather than per landlord or property.

The Council will impose a penalty charge where it is satisfied, on the balance of probabilities, that the landlord has not complied with the action specified in the remedial notice within the required timescale.

A landlord will not be considered to be in breach of their duty to comply with the remedial notice if they can demonstrate they have taken all reasonable steps to comply. Where there is evidence, including written correspondence, of repeated and consistent efforts to obtain access to the property, with access repeatedly being prevented by the occupant(s) of the property, a landlord will

not be considered to be in breach of their duty to comply with the remedial notice. A landlord will be expected to have:

- Communicated the risk of harm that the lack of functioning alarms posed to all occupants in writing on multiple occasions
- Requested access to comply with the remedial notice on a regular basis of no longer than every seven days in writing

In considering the imposition of a penalty, the Council may look at the evidence concerning the breach of the requirement of the notice. A non-exhaustive list of methods that may be used to obtain relevant evidence includes, but is not limited to:

- Evidence obtained from a property inspection
- Evidence provided by the tenant or agent
- Evidence provided by the landlord demonstrating compliance with the Regulations by supplying dated photographs of alarms, together with installation records
- That all detector heads have not passed their expiration or replacement date

Landlords need to take steps to demonstrate that they have met the testing requirements at the start of the tenancy requirements. A non-exhaustive list of methods that may be used to evidence compliance with these testing requirements includes, but is not limited to:

- Tenants signing an inventory form which states that they observed the alarms being tested and confirming that the alarms were in working order at the start of the tenancy

Where a landlord is in breach, the local housing authority may serve a remedial notice. Failure to comply with each remedial notice can lead to a fine of up to £5,000. Fines will be applied per breach, rather than per landlord or property

When determining the amount of the penalty charge, regard will be had to whether this is a first breach under the Regulations.

Determining the amount of the penalty charge for a first breach

The minimum amount of a penalty charge for a first breach of the Regulations will be £2500. Only in exceptional circumstances may the Council depart from the application of this statement of principles and issue a penalty charge for less than £2500. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple mitigating factors

The starting level of a penalty charge for a first breach of the Regulations will be £3000. The penalty charge amount will then be varied depending on aggravating and mitigating factors.

Aggravating factor include, but are not limited to:

- The number of alarms not working or missing (the Regulations state there should be one per storey)
- Other fire safety concerns/defects in the property which increase the risk posed to the occupants
- The length of time the offence is believed to have been on-going

- The frequency of complaints by the occupiers to the landlord about the non-working or missing alarms
- The costs of any remedial work the Council have carried out in response to the breach
- Whether the property is let as a HMO (which increases the overall risk)
- The number of occupants living in the property
- Presence of vulnerable occupiers such as elderly, children or disabled people
- Any history of previous enforcement or non-compliance of the landlord
- Attempts to obstruct the investigation

Mitigating factors include, but are not limited to:

- The property being small and low-risk (for example a one-bedroom ground floor flat with a large number of fire escapes including large windows)
- A single occupant living in the property
- Evidence that all required alarms were checked and in working order at the start of the tenancy
- Written evidence that some efforts to gain access and comply with the remedial notice were made and access was prevented by the occupant

Determining the amount of the penalty charge for a subsequent breach

The penalty for subsequent breaches by the same landlord will be £5000. Only in exceptional circumstances may the Council depart from the application of this statement of principles and issue a penalty charge for less than £5000. Exceptional circumstances are rare and unusual and are not established merely by the presence of multiple mitigating factors.

Appendix 3

Statement of principles to determine the amount of a penalty charge for a breach of minimum energy efficiency standards (MEES) with respect to domestic privately rented property

The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015 (“the Regulations”) make it unlawful to rent out a domestic property if it has an EPC (Energy Performance Certificate) rating of F or G (unless a valid exemption has been registered on the PRS Exemptions register).

The Regulations make it unlawful to fail to comply with a compliance notice served by the Council.

The Regulations cover all relevant properties, even where there has been no change of tenancy.

The Regulations were introduced to improve the energy efficiency of housing in the private rented sector and to reduce greenhouse gas emissions and tackle climate change. They should help make tenants’ homes more thermally efficient.

An energy performance certificate (EPC) gives the property an energy efficiency rating – A rated properties are the most energy efficient and G rated are the least efficient. It’s valid for 10 years and must be provided by the owner of a property, when it is rented or sold.

If you are a landlord and you fail, when requested, to provide an EPC for the start of a tenancy, you will be in breach of the Regulations.

An EPC contains information about the type of heating system and typical energy costs. It also gives recommendations about how the energy use could be reduced, lowering running costs. You can find the recommended energy efficiency improvements on the current EPC.

If you’re a private landlord, you must either:

- ensure your rented properties have an EPC with a minimum ‘E’ rating
- register a valid PRS exemption on the PRS exemptions register

Failure to do either of these is a breach of the Regulations.

The Council investigates any potential breaches of the regulations. If the Council is satisfied that you are, or have at any time in the 18 months preceding the date of service of the penalty notice, breached the Regulations, you may be subject to a penalty notice imposing a financial penalty. The Council may also impose a publication penalty.

The “publication penalty” means publication, for a minimum period of 12 months, or such longer period as the Council may decide, on the PRS Exemptions Register of such of the following information in relation to a penalty notice as the Council decides:

- Where the landlord is not an individual, the landlord’s name
- Details of the breach of these Regulations in respect of which the penalty notice has been issued
- The address of the property in relation to which the breach has occurred, and
- The amount of any financial penalty imposed.

The Council will impose the following financial penalties:

- (a) letting a property with an F or G rating for less than 3 months: £2,000
- (b) letting a property with an F or G rating for more than 3 months: £4,000
- (c) registering false or misleading information on the PRS exemptions register: £1,000
- (d) failing to provide information to the Council demanded by a compliance notice: £2,000

The Council may not impose a financial penalty under both subsections (a) and (b) above in relation to the same breach of the Regulations. But they may impose a financial penalty under either paragraph (a) or paragraph (b), together with financial penalties under paragraphs (c) and (d), in relation to the same breach. Where penalties are imposed under more than one of these paragraphs, the total amount of the financial penalty may not be more than £5,000.

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APPENDIX 2

Constitution – Part 4 – Table 4.04 – Community Services

2. Private Sector Housing			
Subject	Detail	Delegated by:	Delegated to:
Power of entry	To exercise the powers of Authorised Officers in respect of entry, inspection and investigation in relation to housing conditions as specified in any legislation the enforcement of which is delegated to <u>the Assistant Director of Community and Housing Services</u> .	Executive Committee	[Assistant Director of Community and Housing Services] / [Strategic Housing Services Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager] / [Private Sector Housing Officer]
General regulatory and enforcement activity for private sector housing (including Houses of Multiple Occupation)	1. To exercise <u>all local authority regulatory and enforcement functions under the legislation listed below:-</u> Housing Act 1985 Housing Act 1988 Housing Act 2004 Management of Houses in Multiple Occupation Regulations 2006 Licensing & Management of HMO & other Houses (Miscellaneous Provisions) (England) Regulations 2006 Environmental Protection Act 1990 <u>section 79(1)(a)</u>		[Assistant Director of Community and Housing Services] / [Strategic Housing Services Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager] / [Private Sector Housing Officer]
	Local Government (Miscellaneous Provisions) Acts 1976, 1982 Prevention of Damage by Pests Act 1949 Public Health Act 1961 Licensing and Management of Houses in Multiple Occupation (additional provisions) (England) Regulations 2007 Mobile Homes Act 2013 Caravan Sites & Control of Development Act 1960 Housing and Planning Act 2016 Electrical Safety Standards in the Private Rented Sector and Social Rented Sector (England)		

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APPENDIX 2

Constitution – Part 4 – Table 4.04 – Community Services

2. Private Sector Housing			
Subject	Detail	Delegated by:	Delegated to:
	<p><u>Regulations 2020</u></p> <p><u>2. To institute legal proceedings for offences under the legislation listed above.</u></p> <p><u>3. To impose a civil penalty for an offence as an alternative to bringing a prosecution.</u></p>		<p><u>2 and 3 Strategic Housing Manager in consultation with Principal Solicitor</u></p>
Caravan Site Licences	To approve a transfer or renewal of a Caravan Site Licence	Executive	[Assistant Director of Community and Housing Services] / [Strategic Housing Services Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager]
Caravan Site Licences	To approve licence for new site	Council	[Assistant Director of Community and Housing Services] / [Strategic Housing Services Manager]
Property Tribunal	To make application to a Residential Property Tribunal in relation to enforcement or other provisions under the Housing Act 2004	Executive Committee	[Assistant Director of Community and Housing Services] / [Strategic Housing Services Manager]
Illegal evictions and harassment	<u>1.</u> To institute legal proceedings in respect of illegal evictions and harassment under provisions of the Protection From Eviction Act 1977 and Housing Act 1988 <u>(as</u>	Executive Committee	<u>1 and 2</u> [Assistant Director of Community and Housing Services] / [Strategic Housing Services

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- Deleted: Housing Act 2004 – notices etc
- Deleted: To issue notices and orders in relation to improvement, prohibition, revocation, hazard ¶ awareness and emergency action under the Housing Act 2004, sections 11,12,14,16, 20,21,23,25,28,29,40,41 &43 and undertake default work in respect of such notices where necessary.¶
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APPENDIX 2

Constitution – Part 4 – Table 4.04 – Community Services

2. Private Sector Housing			
Subject	Detail	Delegated by:	Delegated to:
	<p><u>amended by the Renters Right Act 2025).</u></p> <p>2. <u>To impose a financial penalty for an offence under section 1 of the Protection from Eviction Act (as amended) as an alternative to bringing a prosecution.</u></p>		<p>Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager] <u>in consultation with the Principal Solicitor</u></p>
<p>Renters Rights Act 2025 – investigatory powers</p> <p>(Added following report on Renters Right Act in March 2026)</p>	<p>To exercise all powers in respect of entry, inspection, investigation, service of notices and other functions for the purposes of the following legislation: - Renters Rights Act 2025 sections 114 to 132 (investigatory powers) and section 110 (reporting to government)</p>	Executive Committee	[Assistant Director of Community and Housing Services] / [Housing Strategy Manager] / [Private Sector Housing Team Leader] / [Housing Strategy & Enabling Team Leader] / [Private Sector Housing Officer]
<p>Renters Rights Act 2025 Investigations</p> <p>(Added following report on Renters Right Act in March 2026)</p>	<p>To undertake investigations into potential offences under sections 33, 34, 39 and 56 of the Renters Rights Act 2025</p>	Executive Committee	[Assistant Director of Community and Housing Services] / [Housing Strategy Manager] / [Private Sector Housing Team Leader] / [Housing Strategy & Enabling Team Leader] / [Private Sector Housing Officer]
<u>Discrimination in the rental market</u>	<u>To take enforcement action under Chapter 3 of the Renters Rights Act 2025, including the imposition of financial penalties in accordance with the Councils Enforcement and Civil Penalties Notice Policy</u>	<u>Executive Committee</u>	<u>Assistant Director of Community and Housing Services</u>
<u>Stating the proposed rent and rental bidding</u>	<u>To take enforcement action under Chapter 6 of the Renters Rights Act 2025, including the imposition of financial penalties in</u>	<u>Executive Committee</u>	<u>Assistant Director of Community and Housing Services</u>

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APPENDIX 2

Constitution – Part 4 – Table 4.04 – Community Services

2. Private Sector Housing			
Subject	Detail	Delegated by:	Delegated to:
	<u>accordance with the Councils Enforcement and Civil Penalties Notice Policy</u>		
<u>Private Sector Housing Enforcement and Civil Penalty Policy</u>	<u>To update the Policy in line with any legislative or government guidance updates</u>	<u>Executive Committee</u>	<u>Assistant Director of Community and Housing Services following consultation with the Portfolio Holder for Housing</u>
Building Act notices	To serve notices under the Building Act 1984, Sections 59, 63, 64, 70, 72(1)(a) 76 & 79 in relation to housing conditions, to undertake work in default and recover expenses.	Executive Committee	[Assistant Director of Community and Housing Services] / [Strategic Housing Services Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager] / [Private Sector Housing Officer]
Lifetime Grants - approval	To approve applications for Lifetime Grants under the Housing Assistance Scheme and any subsequent schemes for works of repair, improvement, adaptation or thermal efficiency and applications for Landlord (HMO) Lifetime Grant	Executive Committee	[Deputy Chief Executive] / [Assistant Director of Community and Housing Services] / [Strategic Housing Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager]
Disabled Facilities Grants	To approve applications for mandatory Disabled Facilities Grant	Executive Committee	[Assistant Director of Community and Housing Services] / [Strategic Housing Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager]
Disabled Facilities Grant - Repayment	To waive the condition requiring repayment of a Disabled Facilities Grant in accordance with the Government's Criteria set out in Section 5.19(b) of the report to	Executive Committee	[Assistant Director of Community and Housing Services] following consultation with the relevant portfolio holder.

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APPENDIX 2

Constitution – Part 4 – Table 4.04 – Community Services

2. Private Sector Housing			
Subject	Detail	Delegated by:	Delegated to:
	the Executive Committee on 7 th January 1999		
Lifetime Grants - cancellation	To cancel Lifetime Grant and recover interim payments for failure to complete eligible work within 12 months of approval date or to grant extensions of time for completion	Executive Committee	[Assistant Director of Community and Housing Services] / [Strategic Housing Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager]
Council land and premises - dealing with Trespassers	To authorise the exercise of Local Authority powers under the Criminal Justice & Public Order Act 1994 relating to occupation of council land and premises by trespassers.	Executive Committee	[Assistant Director of Community and Housing Services] / [Strategic Housing Manager] / [Private Sector Housing Manager] / [Housing Strategy and Enabling Team Leader].
Proceedings for possession	To authorise the instigation of civil legal proceedings for possession of council land and premises occupied by trespassers without permission and further legal proceedings for their eviction from such land and premises.	Executive Committee	[Assistant Director of Community and Housing Services] / [Strategic Housing Manager] / [Private Sector Housing Manager] / [Housing Development & Strategy Manager].
Council land - bunding	In connection with the construction of bunding to prevent trespass on council land or removal of bunding provided for such purpose the Executive Director of Leisure, Environmental & Community Services shall, before taking action, consult with relevant Ward Members and residents in the vicinity likely to be affected. The decision to construct or remove bunding shall be delegated to the Director of Leisure, Environment & Community Services following	Executive Committee	[Deputy Chief Executive] / [Assistant Director of Community and Housing Services] / [Strategic Housing Manager] following consultation with Ward Members

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APPENDIX 2

Constitution – Part 4 – Table 4.04 – Community Services

	consultation with the relevant Ward Members		
Home Improvement Agency	To deal with day to day management of the Home Improvement Agency Service	Executive Committee	[Assistant Director of Community and Housing Services] / [Strategic Housing Manager] / [Private Sector Team Leader]
Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015	To implement enforcement powers under the Energy Efficiency (Private Rented Property) (England & Wales) Regulations 2015	Executive	[Assistant Director of Community and Housing Services]

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APPENDIX 2

Constitution – Part 4 – Table 4.04 – Community Services

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APPENDIX 3

4. Enforcement Powers – Private Sector Housing			
Subject	Detail	Delegated by:	Delegated to:
Electrical Safety Standards Enforcement Action	To take enforcement action under the Electrical Safety Standards in the Private Sector (England) Regulations 2020	Executive	Assistant Director of Community and Housing Service
Housing Act 2004 – imposition of a financial penalty as an alternative to prosecution	To impose a financial penalty for breach of duties under the Housing Act 2004 (in accordance with Section 126 and Schedule 9 of the Housing and Planning Act 2016) such penalty set at £1000 for a first offence and £3000 for subsequent offence(s)	Executive	Assistant Director of Community and Housing Service

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Economic Development & Regeneration Service Delivery

Relevant Portfolio Holder	Councillor Matthew Dormer Leader and Portfolio Holder for Economic Development
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Rachel Egan Assistant Director Regeneration & Property Services
Report Author Georgina Harris	Job Title: UK Shared Prosperity Fund Manager Contact email: Georgina.harris@bromsgroveandredditch.gov.uk Contact Tel: 01527 534082
Wards Affected	All
Ward Councillor(s) consulted	No
Relevant Council Priority	Economic Development
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) Earmarked reserves be released to fund economic development and regeneration activities as follows:**
 - a. Worcestershire Growth Hub - £140,000**
 - b. Redditch Youth Hub - £120,000**
- 2) Up to £70,000 of earmarked reserves be released to fund the Betaden programme with authority to agree the final contribution and associated outputs delegated to the Assistant Director for Regeneration and Property Services following consultation with the Leader of the Council.**

2. BACKGROUND

- 2.1 The Worcestershire Local Enterprise Partnership (WLEP), now operating through Worcestershire County Council as the accountable body, provides the strategic framework for delivering business support and skills initiatives across Worcestershire. It operates through a blended funding model, combining core Government grant funding with a range of programme-specific resources, including UK Shared Prosperity Fund (UKSPF), legacy Growth Deal funding and

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contributions from local partners. Between April 2022 and March 2026, Redditch Borough Council, alongside the other district councils, has contributed to the delivery of these activities through its UKSPF allocation, enabling the continuation and enhancement of local business and employability support. With UKSPF funding due to cease, there is currently no confirmed replacement funding stream, creating a significant risk to the continuity of these services.

- 2.2 The Worcestershire Growth Hub is a core component of this delivery model, providing a single access point for businesses to obtain advice, skills support and information on grant and investment opportunities. As part of a national network supported by Government, Growth Hubs are recognised as an effective mechanism for improving business productivity, resilience and growth by simplifying access to a complex support landscape. In Worcestershire, the Growth Hub has been enhanced through UKSPF investment, enabling more targeted local support. The loss of this funding would significantly reduce the level of tailored support available to Redditch businesses, limiting their ability to access specialist advice, workforce development opportunities and growth funding.
- 2.3 Similarly, the Redditch Youth Hub provides an integrated, partnership-based delivery model supporting young people aged 16–24 into employment, education and training. The Hub brings together Jobcentre Plus, local authority provision and partner organisations, including WLEP, to deliver coordinated employability support aligned to local labour market needs. Youth Hubs form part of a national programme led by the Department for Work and Pensions and funded through Government employment support initiatives, with local delivery dependent upon partnership contributions and coordination. The continuation of the Redditch Youth Hub is therefore reliant on sustained local investment to complement national funding and maintain a physical, place-based offer. Without this, there is a clear risk of reduced engagement with young people who are not in education, employment or training, and a corresponding increase in economic inactivity.
- 2.4 In the absence of UKSPF, the continuation of both the Growth Hub and Youth Hub within Redditch will require local financial support. Failure to provide this funding would result in a reduction or cessation of locally accessible business support and employability provision, with direct implications for economic growth, workforce development and inclusive opportunity within the borough.

3. OPERATIONAL ISSUES

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-
- 3.1 Worcestershire LEP and Worcestershire County Council have developed a set of proposals to enable the continuation of key programmes previously supported through UKSPF, including the Worcestershire Growth Hub, the Redditch Youth Hub and a business support programme delivered through BetaDen. These proposals set out delivery models, outputs and funding requirements for the continuation of services between April 2026 and March 2028. Redditch Borough Council officers have engaged with both organisations to review and refine the proposals, ensuring that they are aligned with the Council's economic development and regeneration priorities and that they demonstrate appropriate value for money. This has included consideration of local delivery impacts, targeted support for Redditch residents and businesses, and the extent to which the proposed programmes complement existing provision and maximise outcomes from the Council's investment.
- 3.2 The Worcestershire Growth Hub provides the principal local gateway to business support, offering coordinated access to local, regional and national advice, funding and specialist services through a single, easily accessible service. Between 1 April 2022 and 31 March 2026, the Growth Hub supported 398 businesses within Redditch. A proposed Council contribution of £140,000 would enable the delivery of a minimum of 170 additional business assists over two years, ensuring the continuation of targeted support for local businesses.
- 3.3 The Redditch Youth Hub provides one-to-one, personalised support to help young people prepare for and access education, employment and training opportunities. Since opening in April 2024, the Youth Hub has supported 493 young people from Redditch in its first two years of operation. The proposed Council contribution of £120,000 would enable the continuation of this provision along with a new outreach programme, targeting support in areas of highest need and improving access for young people who may not otherwise engage with existing services.
- 3.4 BetaDen provides a county-wide business innovation support programme delivered across a number of Worcestershire districts. A proposed Council contribution of £70,000 would secure access for Redditch businesses to a range of targeted support over the next two years, including six places on the Incubate programme supporting early-stage technology businesses, five places on the BetaDen Digital programme focused on digital adoption and artificial intelligence, and up to 65 places on a programme of workshops covering topics relevant to businesses investing in new product development and process innovation. Access to this provision is dependent on district-level

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financial contributions; without such funding, businesses in non-contributing areas would not be eligible to participate in the programme free of charge.

4. FINANCIAL IMPLICATIONS

- 4.1 The Council has an ear marked reserve for Economic Growth with a balance of £841,000 as of 31st March 2026. £300,000 has already been allocated in the budget to continue the delivery of the Innovation Lighthouse business support programme delivered by Warwick Manufacturing Group. This leaves a balance of £541,000 that could be used to support the continuation of business support and youth hub activity in Redditch.
- 4.2 It is proposed that three projects are funded for the period from 1 April 2026 to 31 March 2028, to a value of £330,000 from the remaining £541,000 as shown in the table below:

Project	Budget	Commitments	Further details
Economic Growth Reserve as at 01.04.2026	£841,000		
Existing Projects:			
Innovation Lighthouse business support programme		£300,000	Delivered by Warwick Manufacturing Group. Delivery to 31 March 2028
Proposed Projects:			
Betaden		£70,000	Proposed in this report. Delivery to 31 March 2028
Worcestershire Growth Hub		£140,000	Proposed in this report. Delivery to 31 March 2028
Redditch Youth Hub		£120,000	Proposed in this report. Delivery to 31 March 2028
Unallocated:			
Remaining Balance		£241,000	Plans to be confirmed

REDDITCH BOROUGH COUNCIL**Executive
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Total	£841,000	£841,000	
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- 4.3 Subject to approval of the recommendations in this report, budget will be vired to the projects identified above, leaving a balance of £241,000 yet to be allocated in the Economic Growth Reserve.

5. LEGAL IMPLICATIONS

- 5.1 In order to deliver the proposed activities it will be necessary to enter into contracts with Worcestershire County Council.

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

- 6.1 All activities proposed in this report will be completed prior to local government reorganisation.
- 6.2 Funding for economic development activity post March 2028 is not yet confirmed. It is expected that responsibility for delivery of economic development and the funding that supports this activity will fall within the remit of a new Strategic Authority.

Relevant Council Priority

- 6.2 The proposed use of the earmarked reserves will contribute to delivering the Council's priority of Economic Development.

Climate Change Implications

- 6.3 There are no climate change implications directly relating to this report.

Community Impact

- 6.4 The proposed activities will support both new and established businesses, helping them to grow, create jobs and drive economic growth. Funding for the Redditch Youth Hub will provide targeted support to help young people progress into education, employment or training enabling them to benefit from future job creation and economic opportunities.

Equalities and Diversity Implications

- 6.5 Equality and diversity implications will be considered in the delivery of the funded services.

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7. RISK MANAGEMENT

- 7.1 Failure to secure funding for business support activities will lead to a reduction in services available to businesses across the borough. Without additional investment, the Growth Hub will be limited to delivering a core, reactive service focused solely on responding to enquiries. The proposed funding contribution would enable the Growth Hub to provide a higher level of business support and take a more proactive approach in targeting and supporting priority sectors.
- 7.2 The Betaden programme delivers innovation support to both new and established businesses, helping them explore how innovation can drive improvements in productivity and sustainability. It plays a key role within the local innovation ecosystem and will contribute to achieving the ambitions set out for the Innovation Centre. By providing a financial contribution to the programme, the Council will ensure that local businesses can access a broad range of expertise to support the development of new products and processes, including digital adoption and the use of Artificial Intelligence.
- 7.3 The Redditch Youth Hub has been in operation for two years and has supported a substantial number of young people during this time. However, youth unemployment remains a significant challenge, and further action is needed. The proposed contribution to the Youth Hub will fund targeted outreach activities aimed at engaging the hardest-to-reach young people, enabling them to access a service that has already demonstrated its effectiveness.

8. APPENDICES and BACKGROUND PAPERS

None

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9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Cllr Matt Dormer	28/5/26
Lead Director / Assistant Director	Guy Revans Executive Director Environment & Communities	12/5/26
Financial Services	Debra Goodall Assistant Director Finance & Customer Services	12/5/26
Legal Services	Claire Felton Assistant Director Legal, Democratic & Procurement Services	12/5/26
Policy Team (if equalities implications apply)	Hannah Corredor Assistant Director – Corporate Services & Transformation	12/5/26

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Annual Housing Complaints Performance and Service Improvement Report

Relevant Portfolio Holder	Councillor Ashley Monk
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Assistant Director Community and Housing Services
Report Author: Matthew Bough	Job Title: Strategic Housing Services Manager Contact email: matthew.bough@bromsgroveandredditch.gov.uk Tel: 01527 64252 ext 3120
Wards Affected	(All Wards);
Ward Councillor(s) consulted	N/A
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 Annual Housing Complaints and Service Improvement Report (Appendix1) is approved;**
- 2) The Housing Ombudsman Complaint Handling Code Self-Assessment is approved (Appendix 2); and**
- 3) The Housing Complaints Policy (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 on 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 handling procedure which must satisfy the requirements of the Housing Ombudsman complaint handling code which became mandatory from April 2024.

- 2.3 The Annual Complaints Performance and Service Improvement Report is a mandatory requirement for social landlords to ensure compliance with the Housing Ombudsman's Complaint Handling Code.

3. OPERATIONAL ISSUES

Complaint Self-Assessment

- 3.1 The Housing Ombudsman Complaint Handling Code 2024 requires 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 with the Complaint Handling Code
 - Take any necessary action to ensure that Complaint Handling 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 Corporate Leadership Team and is attached at Appendix 2.
- 3.5 On completing the self-assessment Officers identified that the Complaints Standard was not always specific in its terminology of who can make a Housing Complaint.
- 3.6 The Housing Complaints Standard has been amended to provide clarity in that it applies only to residents, service users and members /

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representatives and that residents or people affected by a Housing Service who are not Housing Tenants should instead follow the Corporate Complaints Policy.

- 3.7 In addition the Housing Ombudsman service undertook a separate review of our Complaints Standard and in May 2026 made a number of recommendations to improve the Standard, this included renaming it a Policy. The recommendations have been incorporated into the Housing Complaints Policy attached as Appendix 3.

Annual complaints performance and service improvement report

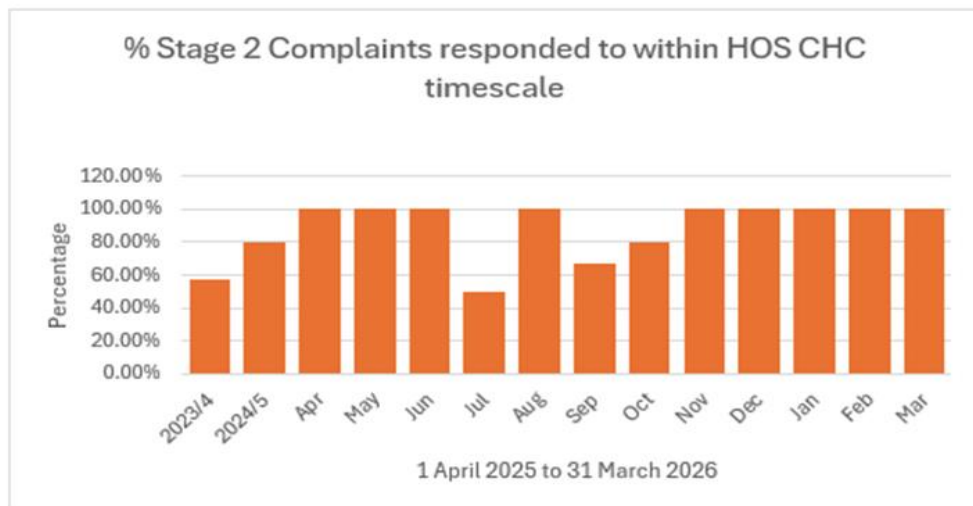
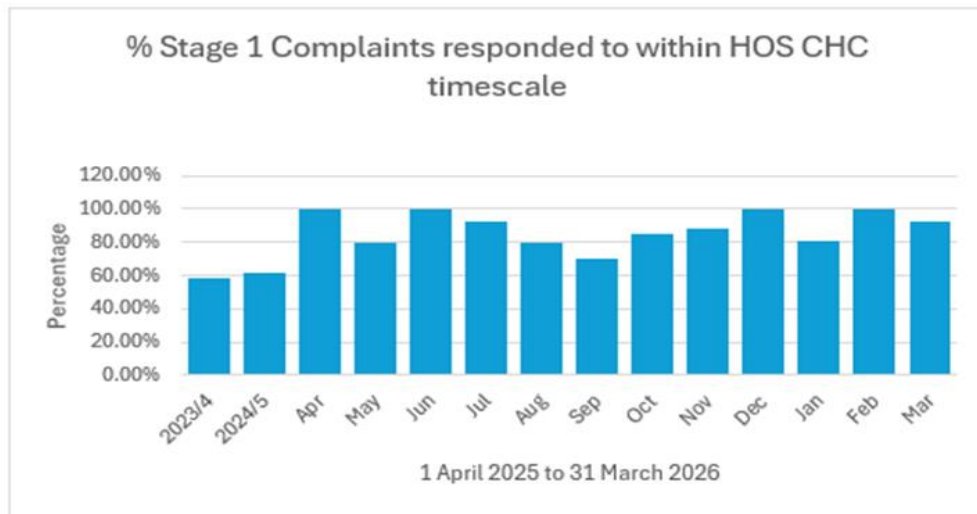
- 3.8 The Housing Service is committed to providing an excellent service for its customers but recognises that it does not always get it right. The Council recognises that customers have a right to complain when they feel the authority has fallen short of their expectations.
- 3.9 As well as giving the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

Key Complaint Stats	2024/25	2025/26
Complaints Received at Stage 1	124	130
Complaints Responded to within Timescale	62%	88.7%
Complaints escalated to Stage 2	17%	22%
Stage 1 Complaints upheld	47.5%	50%
Ombudsman requests received:	12	19

- 3.11 The graphs below show the percentage of complaints responded to within the Housing Ombudsman Complaint Handling Code requirements including the figures for 2023/24 and 2024/25 for comparison, indicating that performance has improved significantly during 2025-2026, demonstrating the impact of focused work to strengthen complaint handling arrangements across the service.

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3.12 Between 1st April 2025 and 31st March 2026, 50 learning outcomes were recorded because of complaints that were fully or partially upheld. We have taken clear and practical action to put things right and improve services based on what we have learned from complaints.

These include:

- Improved communication standards, including reinforcing expectations around call-backs, appointment updates, and keeping tenants informed when delays occur.
- Additional staff training for Repairs scheduling teams, call handlers, and complaint handling officers, particularly around customer care, vulnerability awareness, and safe advice.

-
- Strengthened record-keeping controls, including retaining repair tickets, improving case notes, and investigating failures where reports were not actioned.
 - Process reviews and changes to ensure follow-on works are booked correctly, cancelled works are recorded promptly, and repeat failures are avoided.
 - Enhanced contractor management, including direct feedback to contractors, reaffirmation of expected standards, and action taken where behaviour or quality fell below expectations.
 - System-based improvements, such as alerts for vulnerable households and dispersed temporary accommodation units, clearer job ticket wording, and improved access to accurate technical information for staff.
 - Increased management oversight, with recurring issues reviewed in team meetings, learning logged formally, and actions tracked to completion.

3.13 Between 1st April 2025 and 31st March 2026 the Council received two determinations where the Housing Ombudsman fully or partially upheld a complaint following an intervention.

3.14 The Housing Complaints Policy clearly sets out the complaint handling principles managers need to apply when investigating a complaint. The Policy 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 are utilised to ensure a consistent complaint response.

4. FINANCIAL IMPLICATIONS

4.1 Compensation was paid to complainants in eleven Stage 1 complaints totalling £1467.56, with a further £3,000 paid to complainants as ordered by the Housing Ombudsman following the two determinations.

5. LEGAL IMPLICATIONS

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- 5.1 The annual housing complaints and service improvement, self-assessment are statutory requirements 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 and the Housing Complaints Standard provides for complaints to be made using several contact methods to ensure the standard is inclusive.

7. RISK MANAGEMENT

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

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- 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.
- 7.4 Quarterly meetings are held with the Portfolio Holder for Housing, as the Member Responsible for Complaints in accordance with the Housing Ombudsman's code.

8. APPENDICES and BACKGROUND PAPERS

Appendix 1 - Annual Complaints Performance and Service Improvement Report 2025-26
Appendix 2 - Housing Complaint Self-Assessment 2025/26
Appendix 3 - Housing Complaints Policy (To Follow).

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9. REPORT SIGN OFF

Department	Name and Job Title	Date
Portfolio Holder	Councillor Bill Hartnett.	TBC
Lead Director / Assistant Director	Judith Willis - Assistant Director Community & Housing	13/5/2026
Financial Services	Debra Goodall, Assistant Director Finance and Customer Services	13/5/2026
Legal Services	Claire Felton, Assistant Director Legal & Procurement Services	13/5/2026



Housing Services

2025-26 Annual Complaints Performance and Service Improvement Report

Contents:

1. Introduction
2. Analysis of our complaint handling performance 2025-2026
 - Complaint Volumes
 - Complaints Upheld - by Department
 - Root Causes
3. Learning from Complaints
4. Housing Ombudsman Determinations received 2025-2026
5. Ombudsman: Landlord Performance Reports and Interventions
6. 2025/26 Annual Self-assessment
7. Tenant Satisfaction Measures (TSMs)
8. Tenant Engagement
9. Conclusion

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1. Introduction

The past year has been one of continued progress and reflection for Housing Services, as we work to deliver safe, high-quality homes and responsive services for all of our tenants. As a council that places our communities at the heart of everything we do, we recognise the vital role feedback plays in shaping the way we deliver our services. Complaints are an essential part of this learning process. They help us understand where things have gone well, where we need to improve, and how we can better meet the diverse needs of residents across Redditch.

This report sets out our performance in handling housing-related complaints over the past year, the improvements we have delivered, and the actions we are taking to ensure we continue to meet the Housing Ombudsman's expectations. Our focus has been firmly aligned with the priorities outlined in the Council Plan 2025–28: providing decent, safe and warm homes; ensuring our services are accessible, fair and responsive; and working transparently to strengthen trust with our tenants.

We remain committed to addressing issues such as damp and mould proactively, maintaining our housing stock to a high standard, and supporting residents when problems arise. Through improved case handling, stronger communication, and a renewed emphasis on listening to tenant voices, we are driving service improvements that reflect both local needs and national regulatory standards.

2. Analysis of our complaint handling performance 2025-2026

Complaint Volumes

This table shows Housing Complaint volumes from 1 April 2025 – 31 March 2026 and a comparison with last year:

Key Complaint Stats	2024/25	2025/26
Complaints Received at Stage 1	124	130
Complaints Responded to within Timescale	62%	88.7%
Complaints escalated to Stage 2	17%	22%
Stage 1 Complaints upheld	47.5%	50%
Ombudsman requests received:	12	19

The increase in the percentage of complaints received compared to the previous year should not be interpreted as a failure in service delivery. Over the reporting period, the organisation has taken deliberate steps to promote, encourage and normalise complaints as a legitimate and positive form of customer feedback. This

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approach is intended to improve accessibility, transparency and trust, ensuring that tenants feel confident and supported in raising concerns when things fall short of their expectations. As a result, an increase in complaints reflects greater awareness of the complaints process and increased tenant engagement, rather than a deterioration in service standards.

Complaints provide valuable insight into service performance and play a critical role in helping the organisation identify areas for learning, improvement and service redesign.

How we compare with other local authorities:

During 2025-2026, the Council received 135 Stage 1 housing complaints across a housing stock of approximately 5,500 homes. This equates to around 25 complaints per 1,000 homes, which is below the national median reported through the Regulator of Social Housing's Tenant Satisfaction Measures. This indicates that a high proportion of issues continue to be resolved through normal service delivery or early action, without the need for formal complaint escalation. The Council remains committed to ensuring that tenants feel able to raise concerns and that complaints are welcomed, responded to fairly, and used as a key source of learning to improve housing services.

Across published local authority housing complaints reports, Stage 2 escalation rates commonly fall in the range of approximately 20%–30%, with lower rates often reflecting stronger early resolution and remedies at Stage 1.

There is no published national average for the proportion of Stage 1 housing complaints upheld by local authority landlords. However, analysis of published annual complaints reports across the sector indicates that Stage 1 upheld (including partially upheld) rates typically fall in the region of 40%–60%. On this basis, Redditch Borough Council's proportion of complaints upheld is in line with the range commonly reported across the sector.

A total of 20 complaints required an extension to the acceptable 20-working-day response timescale. Extensions were applied where investigations were more complex, where additional information or input was required from relevant officers or contractors, or where further issues were raised during the complaint that needed to be considered before a full response could be provided.

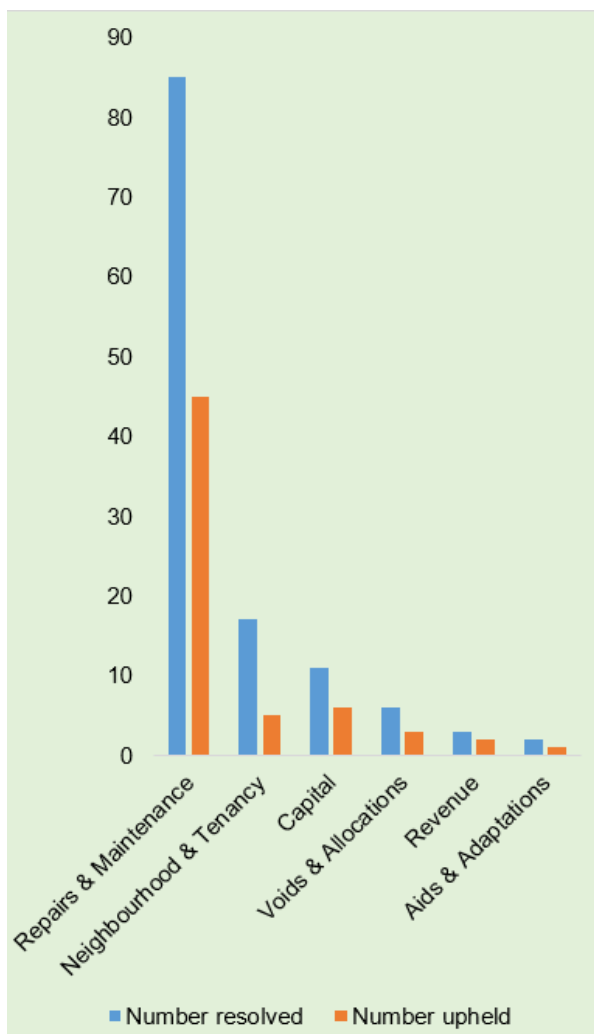
Late responses beyond the acceptable 20-working-day extension equating to 6% of complaints, were primarily associated with more complex complaints that cut across multiple service areas, requiring coordination between teams to ensure a full and accurate investigation. In addition, a small number of complaints were initially handled outside of the formal complaints process in error, which delayed escalation and formal registration. Once identified, these cases were brought back within the complaints process; however, this contributed to timescales exceeding the extended response period. Learning from these cases is being used to strengthen early

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identification of complaints and improve cross-service coordination to reduce the risk of recurrence.

Complaints Upheld - by Department

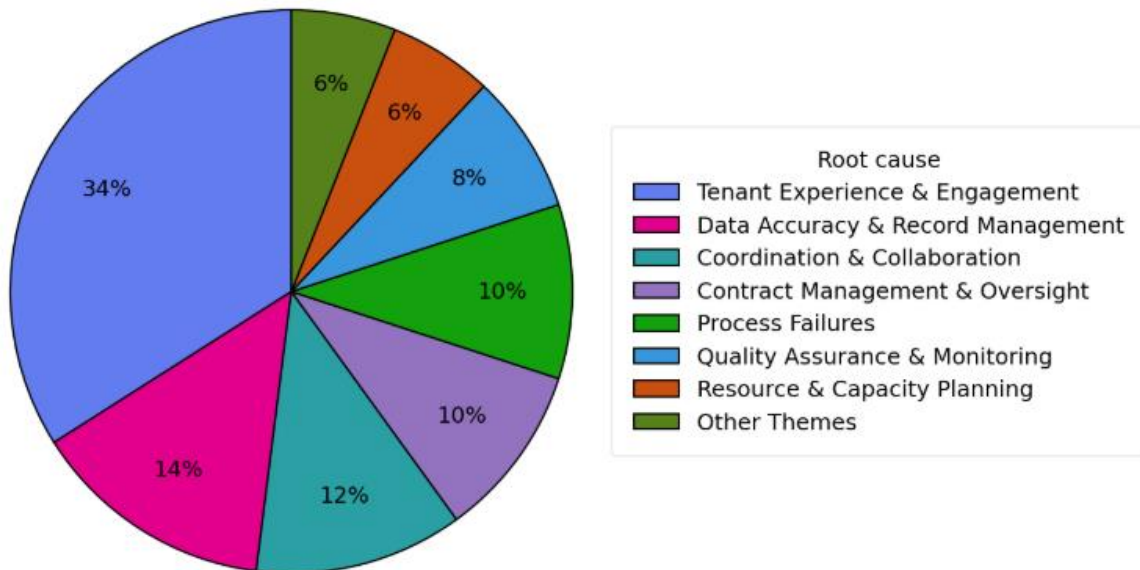
Repairs and Maintenance continue to account for the largest proportion of housing complaints, which is consistent with wider national experience across local authority landlords. This service area generates the highest level of day-to-day contact with tenants and covers issues that most directly affect residents' homes, safety and quality of life, such as heating failures, leaks, damp and mould, and delays to essential repairs. As a result, where expectations are not met or communication breaks down, concerns are more likely to escalate into formal complaints.



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Root Causes

The top root causes of complaints during 2025-2026 were:



- The most common root cause of complaints relates to poor communication with tenants, including missed call-backs, lack of updates when appointments were cancelled or delayed, and inaccurate or unclear information being provided by staff or contractors. In many cases, tenants reported frustration not because the repair itself was complex, but because they were not kept informed or felt ignored once an issue had been reported.
- A significant number of complaints arose due to incomplete, inaccurate, or missing records, including lost repair tickets, unprocessed online reports, missing notes on our IT system, or incorrect bookings. These failures often led to delays, confusion, repeat reporting by tenants, and difficulties in fully investigating complaints once escalated.
- Delays remain a key driver of dissatisfaction, particularly where follow-on works were not booked, inspections were not acted upon, or repairs were repeatedly cancelled or rescheduled. In some cases, delays were linked to staffing pressures or contractor availability, while in others they stemmed from process failures or poor coordination after the initial visit.
- Complaints frequently highlighted problems with contractor conduct, quality of work, and lack of notice, including unprofessional behaviour, damage to tenant property, inadequate protection of homes during works, and contractors attending without appropriate identification or prior notification. These issues point to the need for stronger contract management and clearer expectations when working in tenants' homes.

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- Several complaints were caused by poor coordination between internal teams or between the Council and contractors, particularly where vulnerabilities, priority needs, or safeguarding information were not shared effectively. These breakdowns sometimes resulted in inappropriate advice being given, urgency not being recognised, or residents experiencing avoidable risk or distress.

3. Learning from Complaints

The Housing Ombudsman's Complaint Handling Code stipulates 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.

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.

Between 1st April 2025 and 31st March 2026, 50 learning outcomes were recorded because of complaints that were fully or partially upheld.

We have taken clear and practical action to put things right and improve services based on what we have learned from complaints. These include:

- Improved communication standards, including reinforcing expectations around call-backs, appointment updates, and keeping tenants informed when delays occur.
- Additional staff training for Repairs scheduling teams, call handlers, and complaint handling officers, particularly around customer care, vulnerability awareness, and safe advice.
- Strengthened record-keeping controls, including retaining repair tickets, improving case notes, and investigating failures where reports were not actioned.
- Process reviews and changes to ensure follow-on works are booked correctly, cancelled works are recorded promptly, and repeat failures are avoided.
- Enhanced contractor management, including direct feedback to contractors, reaffirmation of expected standards, and action taken where behaviour or quality fell below expectations.

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- System-based improvements, such as alerts for vulnerable households and dispersed units, clearer job ticket wording, and improved access to accurate technical information for staff.
- Increased management oversight, with recurring issues reviewed in team meetings, learning logged formally, and actions tracked to completion.

Complaints have directly informed service improvements during the year. Feedback from residents has led to clearer communication standards, stronger record-keeping, improved coordination between teams and contractors, and increased focus on vulnerability awareness. These changes demonstrate how complaints are being used positively to improve services and prevent repeat issues.

Complaint performance is presented to the Portfolio Holder for Housing quarterly and included within the Housing Performance Quarterly report to Executive Committee, to enable regular oversight for Councillors on our performance and identified learnings.

4. Housing Ombudsman Determinations received 2025-2026

A Housing Ombudsman determination is the outcome of an independent investigation carried out by the Housing Ombudsman Service after a complaint has exhausted the landlord's internal complaints process. The determination sets out whether maladministration, service failure or no fault has been found, explains the Ombudsman's reasoning, and may include orders or recommendations requiring the landlord to act or make improvements.

Two Housing Ombudsman Determinations were received during 2025-2026.

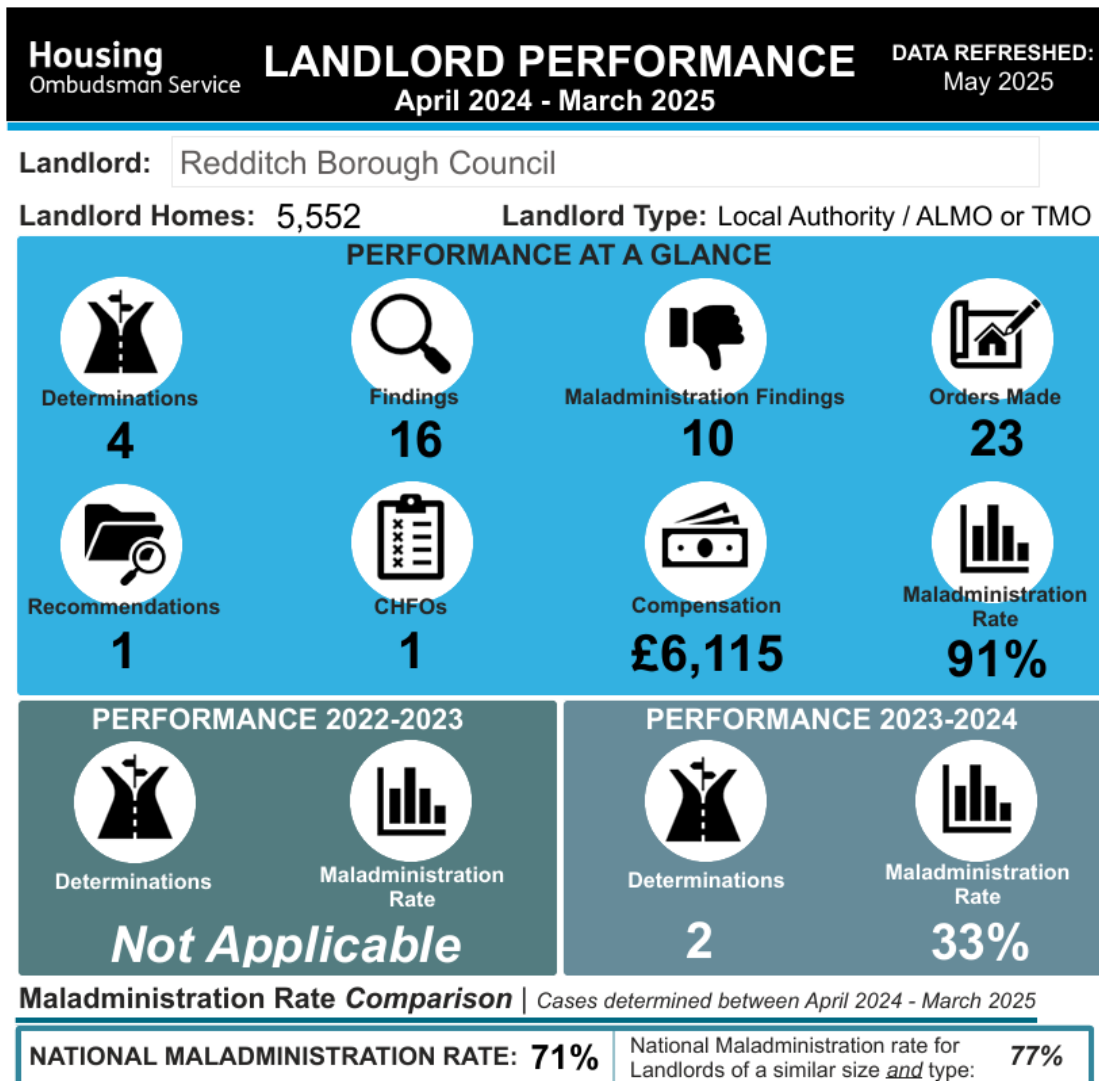
- The Housing Ombudsman issued one determination finding maladministration in the Council's handling of reports of damp and mould and in its complaint handling. The Ombudsman identified delays in addressing the underlying causes of damp and mould, as well as failures in communication and in using the complaints process effectively to put matters right. The Council was ordered to issue a senior management apology, carry out further inspections and repairs, and pay a total of £800 compensation, comprising £600 for distress and inconvenience relating to the damp and mould and £200 for complaint handling failures. The Council has complied with all orders and has used the findings to strengthen services and embed learning to improve outcomes for residents.
- The Housing Ombudsman issued a determination finding maladministration in the Council's handling of reports of damp and mould, related structural repairs, reasonable adjustments, and complaint handling. The Ombudsman identified failures to adequately investigate and address damp and mould, delays in completing associated repairs, and shortcomings in coordinating adaptations and managing issues affecting communal areas. The

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Ombudsman also found that aspects of the complaint handling process did not fully comply with the Complaint Handling Code. The Council was ordered to issue a written apology, commission an independent damp survey, review accessibility and adaptations at the property, confirm completion of outstanding repairs, support an insurance claim for damaged belongings, and pay a total of £2,200 in compensation for distress, inconvenience, time and trouble. The Council was also required to review its complaints procedure to ensure compliance with the Housing Ombudsman’s Complaint Handling Code. All findings have been used to inform service improvements and strengthen processes to improve outcomes for residents.

5. Ombudsman: Landlord Performance Report 2024-2025

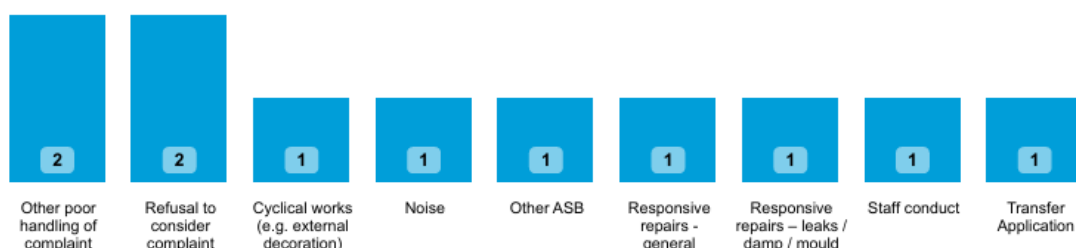
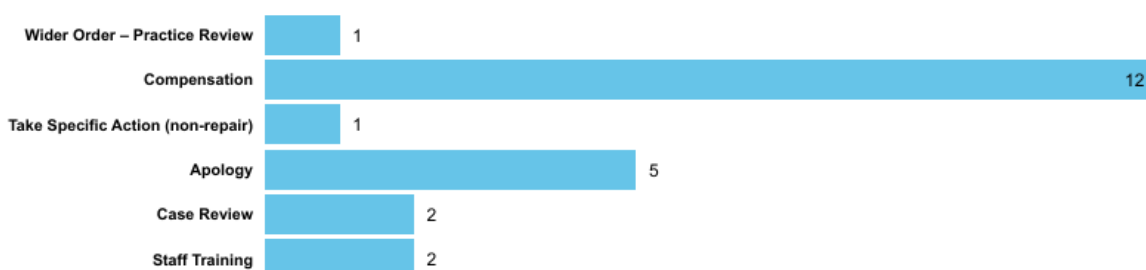
Individual landlord performance reports are published each Autumn, for landlords with 5 or more cases determined within a full financial year. We have received the Landlord Performance Report for Redditch Borough Council for 2024-25:



Appendix 1

Landlord Findings by Category | *Cases determined between April 2024 - March 2025* Table 2.3

Category	Severe Maladministration	Maladministration	Service failure	Mediation	Redress	No maladministration	Outside Jurisdiction	Withdrawn	Total
Complaints Handling	1	3	0	0	0	0	0	0	4
Property Condition	1	1	0	0	1	0	1	0	4
Anti-Social Behaviour	1	1	0	0	0	0	1	0	3
Moving to a Property	0	1	0	0	0	0	2	0	3
Occupancy Rights	0	0	0	0	0	0	1	0	1
Staff	0	1	0	0	0	0	0	0	1
Total	3	7	0	0	1	0	5	0	16

Top Sub-Categories | *Cases determined between April 2024 - March 2025* Table 3.5**Orders Made by Type** | *Orders on cases determined between April 2024 - March 2025* Table 4.1

During the 2024–2025 reporting period, the Housing Ombudsman made four determinations relating to Redditch Borough Council, resulting in 16 findings across a small number of cases. These findings primarily related to complaints handling, property condition, and anti-social behaviour, which are areas that commonly feature in Ombudsman casework across the sector.

The Ombudsman identified instances of maladministration and severe maladministration, particularly where there were delays, communication failures, or weaknesses in how complaints were handled or followed up. While the number of cases investigated was low relative to the size of the housing stock (5,552 homes), the findings highlighted the importance of consistent processes, accurate record-keeping, and effective communication with tenants, especially where issues are complex or prolonged.

Importantly, the Council fully complied with all 23 Housing Ombudsman orders, achieving a 100% compliance rate within required timescales. Orders included apologies, compensation payments, case reviews, procedural reviews, and staff training. This demonstrates the Council's commitment to putting things right for residents and responding constructively to independent scrutiny. Learning from these

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cases has been actively used to inform service improvements, strengthen complaint handling, and reduce the risk of repeat failings.

Performance in context – comparison with national averages

The Housing Ombudsman reviewed a small number of complaints about the Council between April 2024 and March 2025. In those cases, the Ombudsman found that service failings occurred more frequently than is typically seen nationally. As a result, the Council's maladministration rate for these determinations was higher than both the national average and the average for local authority landlords of a similar size.

It is important to view these figures in context. The Ombudsman's assessment is based on a very limited number of cases, meaning that individual cases have a disproportionate impact on the overall results. The findings do not represent the standard of day-to-day service provided across the Council's wider housing stock but instead highlight specific failures within a small number of more complex cases that escalated to formal determination.

Across the sector, local authorities tend to record higher maladministration rates than housing associations, reflecting the complexity of services delivered, the condition and age of stock, and the broader responsibilities councils hold. Nevertheless, the Council acknowledges that the findings point to areas requiring improvement, particularly in relation to complaint handling, record-keeping, communication, and the management of cases that span multiple service areas.

The Council has responded constructively to the Ombudsman's findings. All Ombudsman orders were complied with in full and within required timescales and learning from these cases has been embedded into service improvement activity. This approach reflects the Council's commitment to transparency, accountability, and using complaint outcomes to strengthen services and improve the experience of tenants.

How to contact the Housing Ombudsman Service

The best way to get complaints resolved is to contact us directly. We have a procedure in place to ensure that your complaint is dealt with effectively.

However, you are able to contact the Housing Ombudsman Service at any point for independent help and advice.

If you have exhausted our Complaint Procedure and you remain dissatisfied, you are able to refer your complaint to the Housing Ombudsman Service. The details for the Housing Ombudsman Service are as follows:

You view their website at <https://www.housing-ombudsman.org.uk/residents/> where you can find their online complaint form.

You can call the Housing Ombudsman Service on: 0300 111300.

You can write to them at: Housing Ombudsman Service, PO Box 152, Liverpool L33 7WQ

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6. 2025/26 Annual Self-assessment

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.

Following completion of the annual Housing Ombudsman Complaint Handling Code self-assessment for 2025-26, we can confirm our Housing Complaints Policy is fully compliant with all provisions of the Housing Ombudsman's Complaint Handling Code.

This reflects the strength of the Council's complaints framework, the robustness of our policies and procedures, and the commitment of officers to handling complaints fairly, transparently and within required timescales. Full compliance provides assurance to tenants, elected members and the regulator that complaints are managed in line with statutory expectations and supports a positive complaint-handling culture that values learning and service improvement.

This achievement builds on the progress made during the year and provides a strong foundation for continued improvement and tenant confidence in our complaints process.

The Annual Self-assessment for 2026 along with the Housing Services Complaints Standard 2025 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>

7. Tenant Satisfaction Measures (TSMs)

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.

We are required to provide TSMs generated from management information for housing complaints data for the full period 1st April 2025 to 31st March 2026.

This year's TSM measures for CH01 and CH02 are as follows:

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

- 1) 22.54 Stage 1 complaints per 1000 homes (2024-25 was 22.37)
- 2) 4.54 Stage 2 complaints per 1000 homes (2024-25 was 3.79)

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

- 1) 88.7% Stage 1 responses responded within the Housing Ombudsman's Complaint Handling Code timescale. (2024-25 was 62%)
- 2) 92% Stage 2 responses responded to within the Housing Ombudsman's Complaint Handling Code timescale. (2024-25 was 80%)

This indicated that performance against the Housing Ombudsman's Complaint Handling Code has improved significantly during 2025-2026, demonstrating the impact of focused work to strengthen complaint handling arrangements across the service.

Responses issued within the Complaint Handling Code timescales increased markedly at both stages of the complaints process. At Stage 1, 88.7% of complaints were responded to within the required timescale, representing a substantial improvement from 62% in 2024–25. This reflects stronger triage arrangements, clearer ownership of complaints, and improved monitoring to ensure deadlines are met.

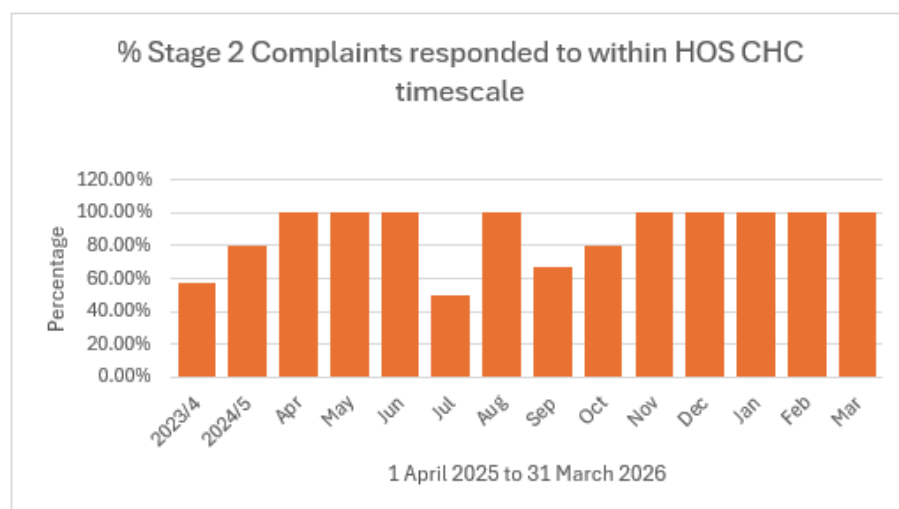
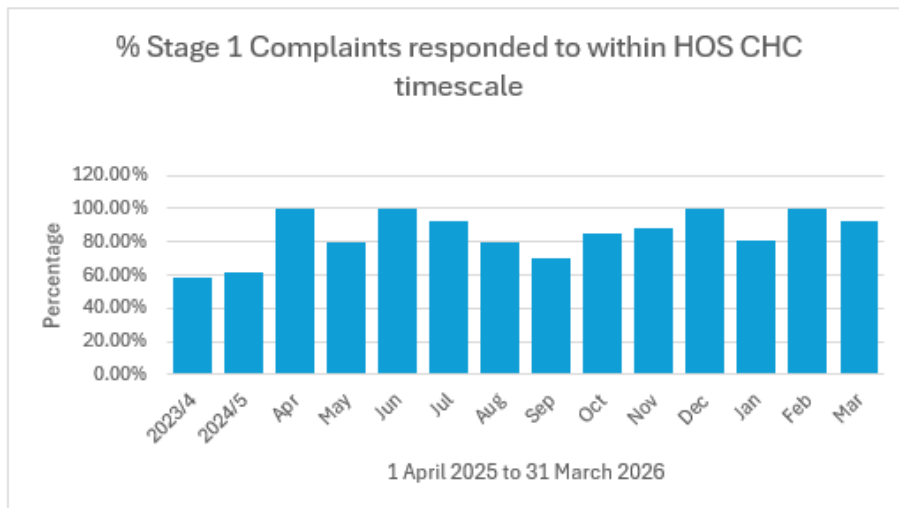
Similarly, performance at Stage 2 improved to 92% of responses issued within timescales, compared with 80% in the previous year. This improvement shows greater consistency in the escalation process and more effective oversight of complex cases requiring senior review.

While complaint volumes per 1,000 homes have increased slightly at both stages, the Council has demonstrated a much stronger ability to respond promptly and in line with the Housing Ombudsman's requirements. This improvement provides greater assurance to tenants that complaints are taken seriously, handled fairly, and resolved in a timely manner.

Maintaining compliance with the Complaint Handling Code remains a key priority. The progress made during 2025–26 provides a strong platform for continued improvement and reflects a positive shift towards a more responsive, resident-focused complaints culture.

The graph below shows the percentage of complaints responded to within the Housing Ombudsman code requirements per month, including the years figures for 2023/24 and 2024/25 for comparison.

Appendix 1



8. Tenant Engagement

During 2025–26, we began the development of a dedicated Tenant Engagement Team as part of our wider commitment to placing tenants at the heart of service improvement. This new approach recognises the importance of listening to customers, understanding lived experience, and involving tenants more meaningfully in shaping housing services.

The Tenant Engagement Team will provide a clear and consistent framework for how tenants can influence decisions, share feedback, and participate in service reviews. This includes opportunities to be involved in shaping policies, reviewing performance information such as complaints and Tenant Satisfaction Measures, and contributing to service improvement initiatives.

By strengthening tenant engagement, we aim to ensure that feedback is gathered proactively rather than only through complaints, helping us to identify issues earlier and design services that better reflect tenant priorities. The team will also support clearer communication and help close the feedback loop, so tenants can see how their views have informed change.

Appendix 1

Residents are encouraged to get involved in the Tenant Engagement Team in a way that suits them, whether through forums, surveys, task-and-finish groups or other engagement activities. Participation does not require previous experience – only a willingness to share views and help improve services for the wider community.

As the Tenant Engagement Team becomes established, it will play a key role in supporting transparency, accountability and continuous improvement. We believe that working in partnership with tenants will strengthen trust, improve outcomes, and contribute to better housing services for all residents.

A new Tenant Engagement Policy has been drafted ready to be agreed by our Executive Committee in June 2026. This Policy will be reviewed as one of the first tasks for the Tenant Panels when they are up and running later this year. The Panels will then set to work on developing our Tenant Experience Strategy, which will further enhance our commitment to having the tenants voice at the heart of all our decision making.

If you would like to influence decisions, share your experiences and help improve housing services, we encourage you to join our Tenant Panels. To register your interest you can complete a short online form found at <https://www.redditchbc.gov.uk/residents/my-home/renting-and-home-tenancy/shaping-your-housing-services/>. Alternatively, you can email the team at neighbourhood.tenancy@bromsgroveandredditch.gov.uk or call the duty line on 01527 587000 where one of our officers will be happy to take your details.

Conclusion

Overall, 2025–26 represents a year of meaningful progress in the Council's handling of housing complaints. There has been a significant improvement in response times at both stages of the complaints process, alongside stronger compliance with the Housing Ombudsman's Complaint Handling Code. While complaint volumes increased slightly, this reflects improved accessibility and trust in the complaints process rather than a decline in service standards. Complaints have continued to provide valuable insight into service pressures, particularly within Repairs and Maintenance, and have been used constructively to drive learning and improvement.

Looking ahead, the focus for 2026-27 will be on embedding a positive complaint-handling culture, strengthening early resolution, improving communication at every stage of the customer journey, and ensuring learning from complaints leads to measurable and sustained service improvements. The development of enhanced tenant engagement arrangements will further support this work, ensuring that tenant voices are heard not only through complaints, but through wider service design and scrutiny.

The Council remains committed to listening to residents, learning from concerns, and using complaints as a powerful tool to improve services, strengthen trust, and ensure that tenants live in safe, well-managed, and well-maintained homes.

Appendix 2: 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	A complaint must be defined as: <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>	Yes	This is clearly set out in point 4.1 of the Complaints Standard which states: <i>“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.”</i>	
1.3	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.	Yes	This is set out within point 4.3 of the Complaints Standard which states: <i>“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.”</i>	

			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 process and the right and process then to take the matter to the Ombudsman.”</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	Yes	Point 6.1 of the Complaints Standard lists exclusions.	

	<p>escalated, and these circumstances must be fair and reasonable to 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</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</i></p>	

	Ombudsman. If the Ombudsman does not agree that the exclusion has been fairly applied, the Ombudsman may tell the landlord to take on the complaint.		<i>fully both verbally and in writing, within ten working days. The 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> <p>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></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	Yes	Point 8.2 of the Complaints Standard states: <i>“Any complaint relating to Housing Services,</i>	The complaints officer meets with all Housing Services Management

	aware of the complaints process and be able to pass details of the complaint to the appropriate person within the landlord.		<i>howsoever received, must be logged with the Housing Reviews and Complaints Team immediately upon receipt.”</i>	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	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 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> Our methods of contact are clearly set out in section 16 of the Complaints Standard.	
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 Housing Complaints and Quality Officer (Complaints Officer) has the responsibility for complaint handling, liaison with the Ombudsman and reporting to the the portfolio holder and Executive Committee	
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		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

	important that complaints are seen as a core service and must be resourced to handle complaints effectively			Housing Complaints and Quality Officer.
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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 Complaints 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	Yes	Our complaints are not handled by third parties.	

	this Code. Residents must not be 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> <ol 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 kept on the Housing Complaints Tracker and all correspondence retained in SharePoint. All complaint responses are also uploaded into the CX Housing Management System.	
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	<p>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></p> <p>Point 15.2 of the Complaints Standard states: <i>“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.”</i></p>	

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>"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."</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: Governance

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 Complaints Performance and Service Improvement Report which includes the list as identified in Code Provision 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 Executive Committee 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 Housing Complaints and Quality Officer, and at Stage 2 we have the Assistant Directors, 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 are 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, with the intention of taking collective responsibility for shortfalls identified through complaints and to maintain professional standards in dealing with complaints.”</i> <i>An update on complaints is provided in the Quarterly Housing Performance Report to Executive Committee. 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; 	Yes	<p>Complaints and Enquiries Standard – Referred to in Section 3, Our Principles</p>	

	<p>b. take collective responsibility for any shortfalls identified through complaints, rather than blaming others; and</p> <p>c. act within the professional standards for engaging with complaints as set by any relevant professional body.</p>			
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Housing Services Complaints Policy 2026

Document Version Control

Created By	Helen Oakes – Housing, Tenancy & Advisory Manager
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Appendix 3

Date Approved				
Date Published				
Maintained By	Helen Oakes			
Review Date				
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
V11	Jo Frost	Review and revision as required by Regulator	10/04/2026	Revision

Appendix 3

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 Policy 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.

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- 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 used for it to be treated as such. Residents that express dissatisfaction will be given a choice to make a complaint.
- 4.4 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.
- 4.5 If none of the above applies, we will treat the 'complaint' as a Service Request. Our definition of a service request is:
- A request from a resident requiring action to be taken to put something right, for example a repair being reported that has not been previously reported. Service requests are not complaints, but will be recorded, monitored and reviewed regularly.

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 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?

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6.1 Where a resident or service user has expressed their dissatisfaction with the Housing Service, but it is not appropriate to follow this Policy. In the circumstances where an alternative procedure is more appropriate the resident or service user will be advised of this at the earliest possible opportunity and will be provided with this information. Such occasions are:

- Residents or people affected by a Housing Service who are not our Tenants or Leaseholders should instead follow the Corporate Complaints Policy.
- 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 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.
- Complaints that have already been investigated and have exhausted our two-stage complaint process.
- Staff personnel issues, such as discipline, grievance, recruitment, and selection.
- Allegations of fraud, theft, or corruption by a member of staff.

6.2 We will not take a blanket approach when considering complaints and each will be reviewed on an individual basis.

6.3 If the Council decides not to accept a complaint, a detailed explanation will be provided to the complainant or their representative, setting out the reasons why the matter is not suitable for the complaints process and the right 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 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.

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- 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 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 resident 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. We will also make clear any aspects of the complaint we are not responsible for.
- 8.3 The Housing Complaints Team will then work personally with the resident, service user or their representative to understand their complaint, and agree a preferred method of contact and proposed date of response. 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 Complaints Team will then work with Service Managers to fully investigate. The Stage 1 response will be provided within 10 working days of the complaint being acknowledged and will include the contact details of The Housing Ombudsman Service.
- 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 Policies.
- 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 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. Residents are not required to explain their reasons for requesting a Stage 2 consideration. The Housing Complaints Team will make reasonable efforts to understand why a resident remains unhappy. Stage 2 complaints will not be reviewed by the same Officer as Stage 1.
- 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:

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- 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.
- We have considered the time that the request for escalation has been brought to our attention and are satisfied that it is out of timescale as referenced in 8.7.

Where it is decided the complaint will not be escalated, the reasons why will be explained to the complainant fully, within five 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 Once the complaint has been escalated, a full review will be conducted. A final written response will be provided within 20 working days of the escalated complaint being acknowledged, which will include the contact details of the Housing Ombudsman Service.
- 8.10 If any further extensions are required, we will agree with the resident regular intervals to update them on the progress of the complaint. Such explanation will also include the contact details of the Housing Ombudsman.
- 8.11 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 accordingly, with regular updates provided to the resident, service user or their representative.
- 8.12 Consider incorporating additional complaints made during Stage 1 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.
- 8.13 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.
- 8.14 The complaint handler will always:
- Approach all complaints acting independently, sensitively and with an open mind free of bias, prejudice, or conflict of interest, taking account of any needs and vulnerabilities.
 - 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.
 - Have access to any staff at all levels to facilitate a quick resolution and 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

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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.

- 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.
- Respond in clear plain language, address of all points raised in the complaint and provide 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)	Five 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

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.

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- 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 can be considered if it is deemed appropriate to do so. A Tier 4 Manager, or above, will make the decision to suspend and/or to continue a complaint.

12. **Discontinuing Complaints**

12.1 Housing Services can decide to stop any investigation or review of a complaint 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 will be made by a Tier 5 or above Manager and sent in writing by letter or email.

12.2 if there is no response from a resident then a complaint response will be provided based on the information we hold. Will be re assess if the resident makes contact after the response is provided and had reasonable grounds for not responding.

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13. Withdrawing Complaints

13.1 A complaint may be withdrawn verbally or in writing at any time by the 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. Unreasonable behaviour & vexatious complaints

14.1 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, 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.

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- 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.

14.2 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 an 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.
- This decision will be subject to review every 12 months.
- 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.

14.3 The Housing Service can apply restrictions in 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 complaints process will be limited to a single point of contact or one form of contact only.
- They may be placed on the Staff Safety Database if it is deemed there is a risk to staff, and in accordance with the Council's Staff Safety Database 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.

14.4 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 resident 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 residents' record whilst restrictions are in force.

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15. How to complain

- 15.1 Residents and service users can complain in person, over the telephone, in writing, by email and digitally.
- 15.2 To complain by telephone residents, service users and their representatives should telephone 01527 64252 during office hours and state to the Customer Service Team they are unhappy with a situation they wish to have rectified or wish to make a complaint about the service that they have or have not received.
- 15.3 To complain by email, residents, service users, or their representatives should address their complaint to housingcomplaints@redditchbc.gov.uk
- 15.4 To complain in writing correspondence should be sent to:

Housing Complaints
Town Hall
Walter Stranz Square
Redditch
B98 8AH

- 15.5 To complain digitally residents and service users and their representatives should use this link to our website: <https://www.redditchbc.gov.uk/residents/my-home/housing-complaints-and-compliments/i-am-a-council-tenant/housing-feedback/>
- 15.6 Residents, service users and their representatives can complain in person at any of our public offices.
- 15.7 The Housing Ombudsman can be contacted at any stage for advice and guidance.

Website: Housing Ombudsman Service
Email: info@housing-ombudsman.org.uk
Phone: 0300 111 3000
Address: Housing Ombudsman Service
PO Box 1484
Unit D Preston
PR2 0ET

16. Equality

- 16.1 The Housing Service will make this Policy available in a clear and accessible format for all residents and service users. The Policy will be available on the Council's website and a copy in all our public offices.
- 16.2 The Housing Service will comply with the Equality Act 2010 and may adapt

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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.

17. Monitoring and Review

17.1 Systems will be in place to ensure full compliance with this Policy.

17.2 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.

17.3 Complaint for the Housing Services will be shared and reviewed with the Housing Management Team, with the intention of taking collective responsibility for shortfalls identified through complaints and maintaining professional standards in dealing with complaints. An update on complaints is provided in the Housing Improvement Plan to the Housing Improvement Board and the Housing Strategic Oversight Board and reviewed independently with the Portfolio Holder for Housing.

17.4 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.

17.5 Where the monitoring and review process identifies 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.

17.6 This Policy 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, a change in procedures or a change in legislation. The outcomes must be reported to members, published on the website and in the Annual Report.

17.7 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.

18. Legislation and Guidance

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

19. Related Policies and Procedures

Appendix 1 – The Compensation Matrix

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REDDITCH BOROUGH COUNCIL

Executive Committee

9th June 2026**Quarter 4 2025/6 Housing Performance incorporating TSM Results**

Relevant Portfolio Holder	Councillor Ashley Monk
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Simon Parry and Judith Willis
Report Author	Assistant Director of Environmental and Housing Property Services and Assistant Director of Community and Housing Services Contact email: simon.parry@bromsgroveandredditch.gov.uk, Judith.willis@bromsgroveandredditch.gov.uk
Wards Affected	All
Ward Councillor(s) consulted	N/A
Relevant Council Priority	Community and 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 is asked to **RESOLVE** that: -

- 1) The Council's Quarter 4 2025/6 Housing Performance in respect of the Tenant Satisfaction Measures (Landlord) are noted.
- 2) The results of the Tenant Participation Surveys covering 2025/6 are noted

2. BACKGROUND

- 2.1 The Regulator for Social Housing (RSH) has established the 'Tenant Satisfaction Measures' (TSM) which places a responsibility on all social housing landlords, in England, to return performance information, so that each provider can be assessed for how well they are providing good quality homes and services.
- 2.2 Of the 22 measures, they are split between those that the landlord is required to measure directly (10) and those that are measured by tenant perception surveys (12).
- 2.3 This report provides an update on the current position regarding all 10 of the landlord measures across Housing Services, together with other supplementary measures critical for service delivery in meeting the outcomes from the RSH. The report also includes the results of the 12 questions that form the Tenant Participation Surveys for 2025/26. The

results and additional text comments within the Tenant Perception Survey has influenced content and actions within the Housing Improvement Plan for 2026/27.

3. OPERATIONAL ISSUES

TSM Landlord Measures 2025/6

3.1 The following sets out the performance for quarter 4 of 2025/26 with commentary where performance has not been on target or where updates on progress are being made. **Appendix 1** summarises the performance data.

3.2 **RP – Keeping Properties in good repair**

RP01: Homes that do not meet the Decent Homes Standard

3.3 The Decent Homes data is recorded within the RBC Asprey Asset Management system, recording each of the four categories to Decent Homes being HHSRS, Reasonably Modern Facilities, State of Repair and Thermal Comfort. Work is ongoing to cleanse and update our data and to input timely and accurate data as work proceeds across all service teams in Housing Property Services. Analysis of the data has resulted in follow up surveys of properties including roofs designated for replacement in 2026 that are affecting non decency, in general whilst some repairs are required to these, replacement has not been necessary. Where other reasons exist for non-decency, these properties are included in the capital investment programme or repairs are undertaken to make them decent.

Stock Condition Data

3.4 Stock condition surveys are in progress carried out by the Council's consultants; urgent issues are passed to relevant teams for action. As more data is collected, the Capital Manager reviews work programmes to ensure they match property needs and meet required standards.

Table 1: Stock Condition Surveys as % of stock

Q1	Q2	Q3	Q4
19.71%	20.68%	25.95%	36.29%

Repairs Completed in Timescales

3.5 Work is ongoing through analysis of performance against repairs completed on time to assess the reasons for delays. The introduction of the new repairs policy which introduced a planned priority code for 60 days will improve performance where historically some activities could

never meet existing priority 3 timescales including window and door replacements.

Damp & Mould

- 3.6 Awaab's Law, effective from 27 October 2025, marks a significant step forward in safeguarding tenants, setting clear and robust legal timeframes for social landlords to tackle serious hazards, including damp, mould and emergency risks. From this date, emergency hazards need to be addressed within 24 hours, and substantial damp and mould cases will be investigated within 10 working days, with a written outcome provided within 3 working days and the home made safe within a further 5 working days, while any major remedial works will commence within 12 weeks if necessary. In readiness, Housing Property Services (HPS) proactively expanded its resources with a dedicated damp and mould team, enhancing capacity and updating systems and processes to meet the new statutory requirements and reporting standards. This forward-thinking approach ensures continued compliance and improved outcomes for residents, with performance on these activities detailed in Appendix 2. Tenants are actively engaged in scheduling appointments, and whilst rescheduling can alter completion timescales, this flexibility helps accommodate tenants' needs. Occasional No Access situations do arise, but the team's strong communication with tenants has proved highly effective, keeping residents well informed, supporting compliance, and significantly reducing avoidable delays.

BS- Maintaining Building Safety

BS01: Gas safety checks

- 3.7 All current gas safety checks are in place for both the Council's domestic boilers and communal boilers. There are 134 capped tenanted properties, and 56 awaiting a turn on and test through the voids process. Each month, an external assessor audits a selection of our activities to confirm operational compliance and reports the findings.

BS02: Fire safety checks

- 3.8 There is a rolling programme of inspection for the Fire Risk Assessments (FRAs). Delays were experienced again in this quarter with the issuing of FRAs in time, due to resource issues with the consultant carrying out these works.

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

Table 2: Fire Remedial Actions

2025/6	Q1	Q2	Q3	Q4
High	788	695	677	661
Medium	1,765	1593	1,539	1,436
Low	363	291	259	181
	2,916	2,579	2,475	2,278

- 3.10 The overall number of outstanding actions continues to fall, however 95.61% of the high-risk items are from the Fire Door and Compartmentation works. The programme is ongoing and in the next quarterly report a schedule of anticipated actions to be closed each quarter will be included. The additional funding in 2026/27 will see increased levels of activity to further reduce outstanding actions.
- 3.11 To address the risks identified, Housing Property Services initiated a fire door inspection programme in September 2025. These inspections confirm that existing doors are fire doors, though built to the standards applicable at the time of installation, and have highlighted issues such as missing door closers. Work is progressing to carry out remedial works to those properties identified.

BS04: Water safety checks

- 3.12 All risk assessments are in place with the renewal of these being undertaken in January 2026. There are 8 remedial actions that are being remedied to address full compliance.

Electrical

- 3.13 The Electrical Safety Standards in the Private Rented Sector (England) (Amendment) (Extension to the Social Rented Sector) Regulations 2025 extend mandatory electrical safety requirements to the social rented sector from 1 November 2025, aligning them with those already in place for private landlords. Under the regulations, social landlords must ensure that all fixed electrical installations are inspected and tested at least every five years by a qualified person and that a copy of the Electrical Installation Condition Report (EICR) is provided to tenants within 28 days, and to new tenants before occupation. The requirements apply to new tenancies from 1 December 2025 and existing tenancies from 1 May 2026, with all inspections and any remedial works to be completed by 1 November 2026, and identified

REDDITCH BOROUGH COUNCIL**Executive Committee****9th June 2026**

remedials addressed within 28 days. These changes strengthen electrical safety for tenants and form part of the wider programme of regulatory reform alongside Awaab's Law and the enhanced consumer standards.

- 3.14 The Council has experienced resource issues through the majority of the second half of the fiscal year with the Electrical Compliance Manager leaving in September and being unable to recruit into this position either on a permanent or temporary basis, this has now been recruited into but has led to a gap in collating electrical remedial actions through this quarter. In the interim as corrective actions are identified through the contractor carrying out the inspection and testing these are then instructed to the Contractor to complete works.

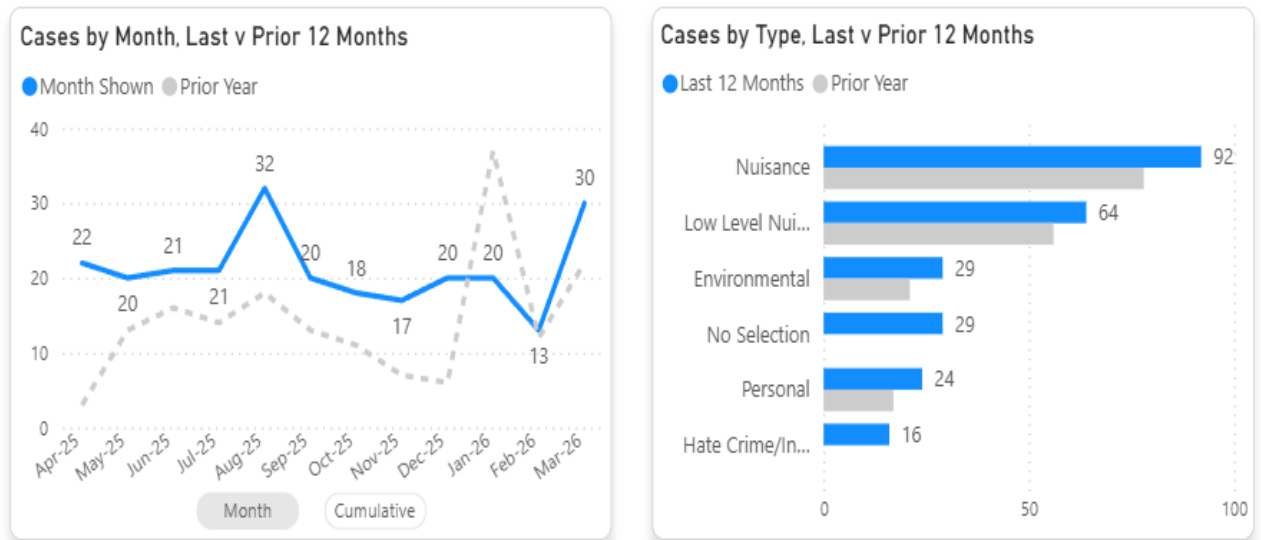
Complaints

- 3.15 43 complaints were received across Housing Services compared to 40 in the previous quarter. With the recruitment of the Senior Complaints officer in Q3 meetings with the Housing Property Services team have been progressing to identify clear trends regarding complaints and actions to improve.
- 3.16 Key themes have been identified from this quarter's complaints, with response times showing clear improvement. The volume of complaints remains below the industry average and represents a very small fraction of total repairs activity. The organisation continues to learn from tenant feedback, ensuring it informs service delivery. Further detail on complaint trends and actions is available within a separate report on this meeting's agenda.
- 3.17 Despite the upheld complaints, the quarter received 52 compliments across Housing Services.

Anti-Social Behaviour (ASB)

- 3.18 The Council provides a robust and accessible ASB service, working closely with partner agencies such as the Police. Enforcement actions include Civil Injunctions, Closure Orders, and Possession Orders. Every ASB complaint is managed according to policy, with a focus on continuous risk assessment and fair treatment.
- 3.19 From January to March 2026, 63 new ASB cases were opened, 89 closed, and 85 remained active. In 2025-2026, 254 ASB cases were reported, a rise from 172 the previous year. Cases include a wide range of issues, such as damage to communal areas, substance misuse, dog-related incidents, and frequent noise complaints.

Figure 1: Cases by Month and by Type



- 3.20 Factors contributing to higher numbers include the ongoing cost of living crisis, impacts on wellbeing, and improved reporting accuracy. The team is now fully staffed, aiming to offer more preventative support. Backlogs in the judicial system remain, but progress has been made in court actions, especially civil injunctions and regaining possession of properties.
- 3.21 Under-reporting of Hate Crime was addressed through staff training, resulting in an increase from zero to thirteen cases this year. The team continues to collaborate with partner agencies to prevent and enforce ASB cases.

Tenant Perception Survey Results 2025/6

- 3.22 The 2025/26 Tenant Satisfaction Measures (TSM) Tenant Perception Survey was carried out between January and February 2026 by We Love Surveys, with 889 tenant responses, representing a 35% increase in participation, from a total surveyable population of around 5,500, delivering a robust confidence level of $\pm 3\%$.
- 3.23 Overall satisfaction (TP01) rose to 64.6%, representing a 7.8 percentage point improvement compared with 2025, indicating continued recovery in tenant confidence. The strongest areas of performance were repairs satisfaction (71.7%) and feeling safe in the home (70.4%), both showing notable year-on-year improvement. All TSM measures improved compared with the previous year, with particularly strong gains in anti-social behaviour handling (+15%),

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keeping tenants informed (+12.8%), and listening and acting on tenant views (+11.9%).

- 3.24 However, the results also highlight persistent challenges. Complaints handling remains the weakest performing measure, with satisfaction at just 28.2%, despite a modest improvement on last year, and over half of respondents who had complained reported dissatisfaction.
- 3.25 Satisfaction levels in communal areas has improved following the introduction of the Caretaking team in Q2, although scores indicate that further targeted action is needed.
- 3.26 Similarly, neighbourhood-related measures also scored lower than core landlord services.
- 3.27 Qualitative feedback continues to show that repairs, delays, and communication issues are the dominant drivers of dissatisfaction, even where staff interactions are viewed positively. Key driver analysis confirms that providing a well-maintained and safe home, alongside an effective repairs service, has the greatest influence on overall satisfaction, reinforcing the need to prioritise delivery improvements in these areas while addressing necessary improvements in complaints handling. Actions associated with the results and feedback received, is incorporated in the new Housing Improvement Plan.

4. FINANCIAL IMPLICATIONS

- 4.1 All work undertaken through the delivery of services highlighted in this report are budgeted through the Capital Programme and the HRA. 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

- 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.

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

- 6.1 No direct implications for Local Government Reorganisation have been identified in this report.

Relevant Council Priority

- 6.1 This report supports the current Council Plan and the following Council priority:

Community and Housing

- Providing Council Housing that is improved and upgraded through the Housing Capital Investment Programme
- Ensuring the housing stock is clean and safe to live in
- Improve time taken for repairs to be completed
- Maximising funding available to the sector.

Climate Change Implications

- 6.2 The responsive, cyclical and planned maintenance of the Council's properties seeks to ensure that Council Housing properties are well maintained, warm and safe. Included within the 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 to tailor services appropriately.

7. RISK MANAGEMENT

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

8. APPENDICES and BACKGROUND PAPERS

Appendix 1 - Measures Table

Appendix 2 – Damp & Mould Measures

Appendix 3 - TSM Tenant Perception Survey Results 2025/6 and Comparison Year on Year

REDDITCH BOROUGH COUNCIL

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9th June 2026**9. REPORT SIGN OFF**

Department	Name and Job Title	Date
Portfolio Holder	Councillor Hartnett	6/5/26
Lead Director / Assistant Director	Guy Revans	11/5/26
Financial Services	Kunmi Joesph	6/5/26
Legal Services	Nicola Cummings, Principal Solicitor – Governance	7/5/26
Policy Team (if equalities implications apply)	N/A	
Climate Change Team (if climate change implications apply)	N/A	

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Executive Committee

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Appendix 1 – TSM Landlord Measures

Keeping Properties in good repair

	Measure Name	Type	Q4 24/5	Q1 25/6	Q2 25/6	Q3 25/6	Q4 25/6	Target	RAG Rating
RP01	Homes that do not meet the Decent Homes Standard	%	4.17%	4.15%	11.90%	10.95%	11.05%	0.00%	Red
RP02.1	Repairs completed within Target Timescale (Non-Emergency)	%	71.95%	61.50%	80.80%	76.93%	77.60%	100%	Red
RP02.2	Repairs completed within Target timescale – (Emergency)	%	83.6%	84.10%	85.00%	83.70%	93.10%	100%	Red

Maintaining Building Safety

	Measure Name	Type	Q4 24/5	Q1 25/6	Q2 25/6	Q3 25/6	Q4 25/6	Target	RAG Rating
BS01	Gas Safety Checks	%	100%	100%	100%	100%	100%	100%	Green
BS02	Fire Safety Checks	%	100%	100%	80%	100%	88%	100%	Red
BS03	Asbestos Safety checks	%	100%	99.50%	100%	100%	100%	100%	Green
BS04	Water Safety checks	%	100%	100%	100%	100%	100%	100%	Green
BS05	Lift Safety Checks	%	100%	87.00%	54.84%	100%	100%	100%	Green
EI01	Electrical Test of Properties	%	90.50%	94.89%	95.17%	95.66%	96.74%	100%	Amber

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EI02	Electrical Test of Communal Areas	%	100%	100%	100%	99.36%	100%	100%	Green
EI03	Smoke Alarms	%	97.36%	98.80%	98.91%	99.18%	99.31%	100%	Amber
EI04	Carbon Monoxide Alarms	%	98.33%	98.89%	98.94%	99.00%	98.85%	100%	Amber

Complaints

	Measure Name	Type	Q4 24/5	Q1 25/6	Q2 25/6	Q3 25/6	Q4 25/6	Target	RAG Rating
CH01.1	Complaints relative to the size of the landlord (Stage 1)	# per 1,000 homes	4.51	3.07	5.25	7.30	7.81	Less than 10	Green
CH01.2	Complaints relative to the size of the landlord (Stage 2)	# per 1,000 homes	0.72	0.90	1.27	0.91	1.45	Less than 3	Green
CH02.1	Complaints responded to within Complaint Handling Code timescales (Stage 1)	%	62%	93%	81.00%	88.89%	90.24%	85%	Green
CH02.2	Complaints responded to within Complaint Handling Code timescales (Stage 2)	%	80%	100%	72.00%	80.00%	100%	85%	Green

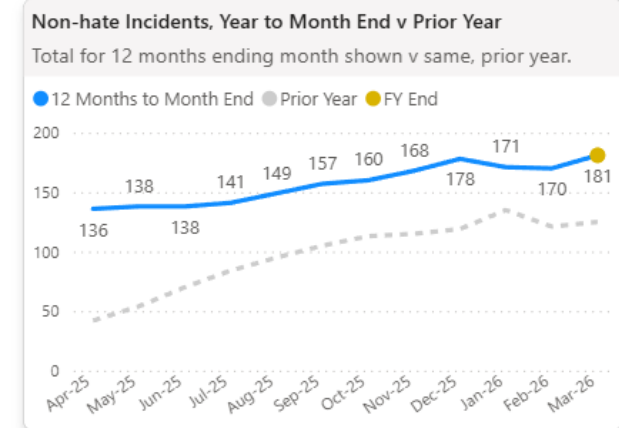
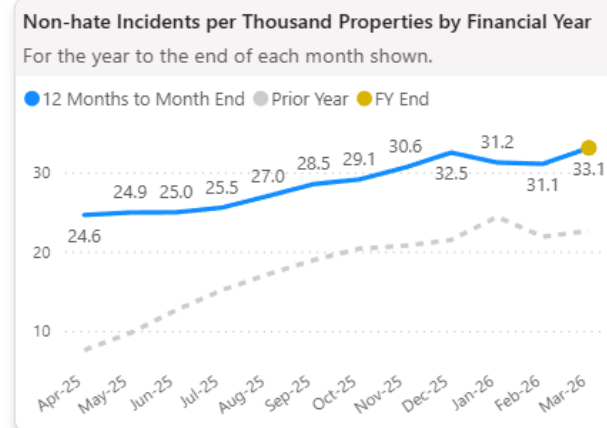
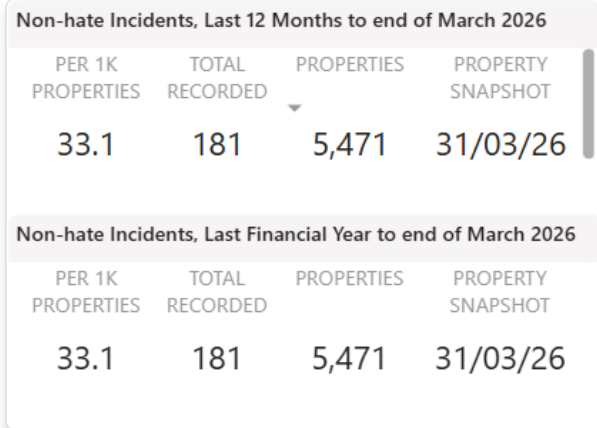
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Anti-Social Behaviour (ASB)

	Measure Name	Type	Q4 24/5	Q1 25/6	Q2 25/6	Q3 25/6	Q4 25/6	Target	Trend
NM01.1	Anti-social behaviour cases relative to the size of the landlord	# per 1,000 homes	22.8	27.1	30.4	32.1	33.1	35.5	Green
NM01.2	Anti-social behaviour cases (involving Hate Crime) relative to the size of the landlord	# per 1,000 homes	0	0	1.1	2.0	2.4	0.6	Red



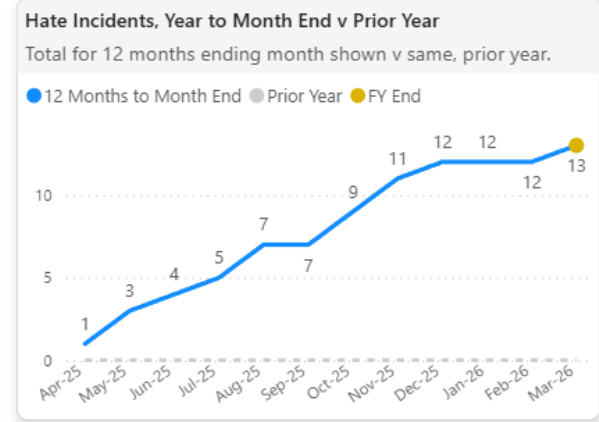
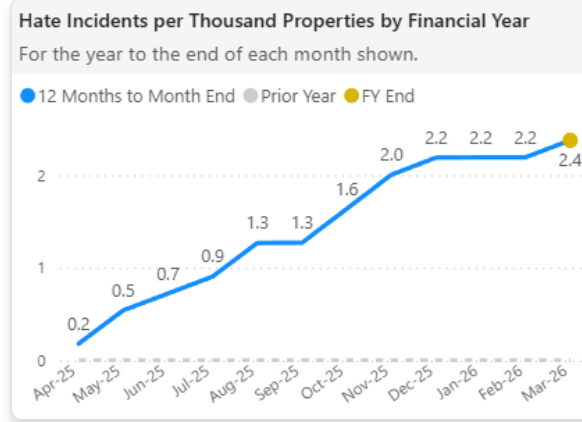
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Executive Committee

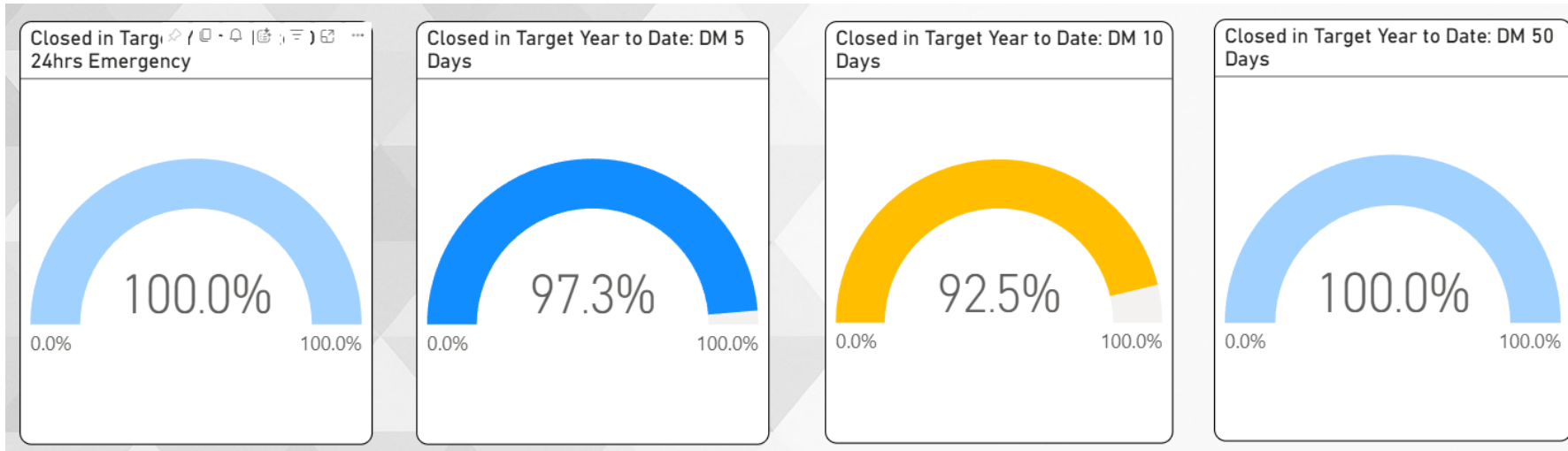
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Hate Incidents, Last 12 Months to end of March 2026			
PER 1K PROPERTIES	TOTAL RECORDED	PROPERTIES	PROPERTY SNAPSHOT
2.4	13	5,471	31/03/26

Hate Incidents, Last Financial Year to end of March 2026			
PER 1K PROPERTIES	TOTAL RECORDED	PROPERTIES	PROPERTY SNAPSHOT
2.4	13	5,471	31/03/26



Appendix 2 – Damp and Mould Measures



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Appendix 3 – TSM Tenant Perception Survey Results 2025/6 and Comparison Year on Year

TSM Code	TSM Question in Full	2023/4 % Satisfied	2024/5 % Satisfied	2025/6 % Satisfied	2024/25 National Average	Change in % Over last 3
TP01	Taking everything into account, how satisfied or dissatisfied are you with the service provided by Redditch Borough Council?	47.4%	56.7%	64.6%	71.8%	17.2%
TP02	How satisfied or dissatisfied are you with the overall repairs service from Redditch Borough Council over the last 12 months?	53.5%	66.7%	71.7%	73.6%	18.2%
TP03	How satisfied or dissatisfied are you with the time taken to complete your most recent repair after you reported it?	50.1%	60.9%	65.4%	69.5%	15.3%
TP04	How satisfied or dissatisfied are you that Redditch Borough Council provides a home that is well maintained?	45.8%	55.5%	65.1%	71.9%	19.3%
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?	48.0%	61.7%	70.4%	77.6%	22.4%
TP06	How satisfied or dissatisfied are you that Redditch Borough Council listens to your views and acts upon them?	34.4%	44.4%	56.2%	61.6%	21.8%
TP07	How satisfied or dissatisfied are you that Redditch Borough Council keeps you informed about things that matter to you?	44.4%	48.0%	60.7%	72.0%	16.3%
TP08	To what extent do you agree or disagree with the following: Redditch Borough Council treats me fairly and with respect?	51.5%	58.1%	67.8%	77.9%	16.3%
TP09	How satisfied or dissatisfied are you with Redditch Borough Council's approach to complaints handling?	21.6%	21.7%	28.2%	35.5%	6.6%
TP10	How satisfied or dissatisfied are you that Redditch Borough Council keeps these communal areas clean and well maintained?	41.8%	42.4%	53.7%	66.7%	11.9%
TP11	How satisfied or dissatisfied are you that Redditch Borough Council makes a positive contribution to your neighbourhood?	39.4%	44.7%	58.1%	64.6%	18.7%
TP12	How satisfied or dissatisfied are you with Redditch Borough Council's approach to handling anti-social behaviour?	39.6%	40.6%	55.7%	59.5%	16.1%

Executive Committee

9th June 2026

REDDITCH BOROUGH COUNCIL**Executive**9th June 2026**Construction of Redditch Innovation Centre**

Relevant Portfolio Holder	Cllr Matt Dormer
Portfolio Holder Consulted	Yes
Relevant Assistant Director	Rachel Egan, Assistant Director Regeneration & Property
Report Author: Neil Batt	Job Title: Regeneration Project Manager Email: neil.batt@bromsgroveandredditch.gov.uk Contact Tel: 07484 546690
Wards Affected	Central Ward
Ward Councillor(s) consulted	Cllr Sharon Harvey
Relevant Council Priority	Economy and Regeneration
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 3 of Part I of Schedule 12A to the Local Government Act 1972, as amended	

1. RECOMMENDATIONS

The Executive Committee RECOMMEND that:-

- 1. The Council utilise all available underspend from within the Town Deal programme (as set out in section 2.5) for construction of the Innovation Centre.**
- 2. The Council accept the £2,425,000 Enterprise Zone funding from Birmingham City Council for the construction of the Innovation Centre and incorporate it into the Council's Capital Programme.**
- 3. Subject to the agreement of recommendations 1 and 2, authority be delegated to the Assistant Director Regeneration & Property Services, in consultation with the Section 151 Officer to enter into the necessary contracts and legal agreements required to implement the recommendations within this report.**

2. BACKGROUND

- 2.1 In June 2021, Redditch secured an historic investment of £15.6 million Town Deal funding. Town Deal is a national economic regeneration programme designed to reshape towns and secure long-term economic sustainability and growth. The Redditch submission was based on a vision for the transformation of the town summarised in

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the Town Investment Plan. This investment plan was successful in securing funding for the following projects:

- Redditch Innovation Centre (£8,000,000)
- Redevelopment of Redditch Library Site (£4,200,000)
- Redditch Public Realm (£3,000,000)
- Programme Management Costs (£400,000)

TOTAL: £15,600,000

- 2.2 Redditch Innovation Centre will be a brand new 2600m² development in Redditch Town Centre. This will provide the platform for innovation and business growth, specifically (but not exclusively) targeting the digital manufacturing sector to create new and improved opportunities for businesses and local residents.
- 2.3 The accommodation will provide a flexible mix of office, lab and workshop space, combined with meeting rooms, networking areas and a café. The centre will also offer additional business support services and specialist shared digital manufacturing equipment, whilst acting as a hub for new and existing businesses to benefit from shared knowledge and experience.
- 2.4 The decision to cancel the redevelopment of Redditch Library site was taken at the Redditch Borough Council Executive Committee meeting on 29th July 2024, leaving a £4,200,000 underspend.
- 2.5 The Ministry for Housing, Communities and Local Government (MHCLG) agreed that this underspend could be used to further develop the Innovation Centre with a smaller amount also going towards Redditch Public Realm. This report now seeks agreement on behalf of the Council as lead accountable body to allocate the full £4,200,000 underspend to the Innovation Centre, along with £897,501 underspend from the Public Realm project, and £400,000 programme management costs. MHCLG funding rules allow easy virement of funding between projects within the Town Deal programme. This means the Innovation Centre can utilise funding from elsewhere within the programme, subject to S151 Officer approval alongside internal governance processes.
- 2.6 Members are asked to note that public realm works to Church Green West and Unicorn Hill have been completed within budget.
- 2.7 The Committee is asked to note that MHCLG have extended the deadline to spend Town Deal funding until the end of March 2028.

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- 2.8 In consideration of the above, the Innovation Centre has been redesigned to increase the building in size resulting in additional economic benefits and overall sustainability.
- 2.9 Speller-Metcalf were appointed to work alongside the design team to complete the Stage 4 designs (via Procure Partnerships Framework), in line with the decision taken by Executive Committee on 8th July 2025. Stage 4 designs are now in place and we are currently in the process of agreeing final costs for construction.
- 2.11 This report seeks delegated authority to proceed to the construction phase, subject to agreement of final costs, within the budget framework set out in the exempt appendix. Construction is profiled to commence Summer 2026 with an anticipated 70-week programme, completing Autumn 2027. This work will be contracted via a JCT (Joint Contracts Tribunal) Design and Build 2024 Contract.
- 2.12 The project includes £2,425,000 from the Enterprise Zone Regional Investment Funding (EZRIF), now being managed by Birmingham City Council (BCC). This amount was approved by the Enterprise Zone Partnership Board in December 2025 and ratified by Birmingham City Council's (BCC) Cabinet on 20th January 2026. This report requests agreement to accept and spend all grant funding received from BCC on the construction of the Innovation Centre in line with the agreed business case. This funding forms part of the overall project budget, with detailed financial information set out in the exempt appendix
- 2.13 The Committee is also asked to note the project secured an additional £30,435 UKSPF (United Kingdom Shared Prosperity Funding), which was utilised as a contribution towards site enabling works which have already been carried out.

3. FINANCIAL IMPLICATIONS

- 3.1 Construction costs are to be funded by a combination of Town Deal, Enterprise Zone Regional Investment Fund (EZRIF) now managed by Birmingham City Council and Regeneration Reserves.
- 3.2 Construction costs are being developed in line with pre-agreed benchmarked rates which will be reviewed and validated by the Procure Partnerships framework. Additional checks and balances are also taking place including transparent pricing and specialist monitoring, to ensure continued value for money. The Council is also utilising specialist cost consultancy input from Gleeds to represent the Council in negotiating and agreeing final costs with Speller Metcalfe in line with the Stage 3 cost plan and pre-agreed rates. The Council

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reserves the right to source further quotes or tender the works in the event of not reaching an agreement with Speller Metcalfe on final costs.

- 3.3 MHCLG funding needs to be spent by the end of March 2028. EZRIF funding (now managed by BCC) is profiled to be spent in the 2027/28 financial year.

4. LEGAL IMPLICATIONS

- 4.1 The Council's procurement and legal team will remain involved with this process to ensure that best value is demonstrated in line with the Council's Contract Procedure Rules.
- 4.2 Work will be contracted via a JCT Design and Build 2024 Contract. Officers will work closely with legal services in determining the most appropriate contractual arrangements and protections.

5. OTHER - IMPLICATIONS**Local Government Reorganisation Implications**

- 5.1 Assets and ongoing management responsibility for the new Innovation Centre will transfer to the new authority.

Relevant Council Priority

- 5.2 The proposals detailed in this report align with the Council's Corporate Priority "Economy and Regeneration". It is a key project for the Council and will support delivery of objectives to support and encourage new start-up businesses, attract businesses to locate in Redditch and increase footfall in the town centre.

Climate Change Implications

- 5.4 The Innovation Centre remains on track to achieve a Building Research Establishment Environmental Assessments Method (BREEAM) Excellent rating. This reflects the project's commitment to climate-responsive design, as the standard integrates rigorous requirements on energy efficiency, carbon emissions, climate resilience, and sustainable resource use.

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-
- 5.5 AHR Architects are the lead designers of the building and have ensured that designs are environmentally friendly and in line with local and national climate change policies. The design has been through a whole life carbon assessment to minimise the embodied carbon within the building. The super structure has been designed to bring maximum efficiency and reduce material weight. This is achieved by reducing spans where possible to reduce the size of beams and columns. High carbon materials like aluminium have been avoided in favour of long-life and recyclable products like brick.
- 5.4 The building follows a fabric first approach to maximise the sustainability credentials through: a regular, efficient form factor; highly insulated walls (0.15 W/m²K), floor (0.15 W/m²K), and roof (0.15 W/m²K); high-performing windows (1.3 W/m²K) and doors (1.6 W/m²K); and passive solar measures to reduce overheating. It will be fully electric and follow its ventilation, heating, cooling and water systems, which will be low-energy, efficient systems that follow sustainable principles. It will be a sealed (air tightness target 3.5m³/hm² @50Pa), mechanically ventilated building that has a high degree of control to individual spaces that seeks to maintain a consistent and comfortable internal temperature. Heat recovery, whilst ventilating the building, is done through individual Mechanical Ventilation and Heat Recovery (MVHR) units within tenant spaces and central air handling for landlord spaces. Air source heat pumps provide low-temperature heating to spaces via fan-coil units or wet radiators depending on the space.
- 5.5 Note that the designs include a photovoltaic (PV) array on the roof of the building.

Equalities and Diversity Implications

- 5.6 An Equality Impact Assessment has been carried out and has not identified any adverse equality or diversity impacts arising from this project. The Innovation Centre will be open to all businesses and individuals, and it is intended to support inclusive economic growth across Redditch. Although the Centre is not aimed at specific groups, it offers the opportunity to widen access to skills, employment and innovation-led opportunities for a broad range of residents. Equality considerations will continue to be kept under review as the Centre becomes operational, to ensure it remains accessible, fair and inclusive in practice.

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4. RISK MANAGEMENT

5. There is an up-to-date costed risk register which is held by the project team and reviewed at regular intervals.

6. APPENDICES and BACKGROUND PAPERS

Appendices

Appendix 1 – Exempt Information

Background Papers:

“Redditch Town Investment Plan Business Cases” report to the Executive Committee on 28th June 2022

[Issue - items at meetings - Redditch Town Investment Plan Business Cases](#)

“Use of £300k of the Economic Development Reserve for feasibility studies at Matchborough, Winyates and Woodrow” report to Executive Committee 26th November 2024

[Medium Term Financial Plan 25-6 to 27-8 Tranche 1 - Final - covering report only.pdf](#)

“Digital Manufacturing Innovation Centre – Appointment of Design and Build Contractors for Stage 4 Designs” report to the Executive Committee on 8th July 2025:

[Issue details - Digital Manufacturing and Innovation Centre \(DMIC\) – Appointment of Contractor for Stage 4 Designs](#)

“Digital Manufacturing Innovation Centre – Proposed Project Changes” report to the Executive Committee considered on 13th May 2025:

[Link to covering report - Executive Committee 13th May 2026](#)

“Appointment of Design Team and Project Managers – Towns Fund Schemes”, report to the Executive Committee considered on 9th January 2024: [Link to the covering report to the Executive Committee - 9th January 2024](#)

Town Investment Plan: [Town Investment Plan submission | Redditch Town Deal](#)

REDDITCH BOROUGH COUNCIL**Executive**9th June 2026**9. REPORT SIGN OFF**

Department	Name and Job Title	Date
Portfolio Holder	Cllr Sharon Harvey	13/05/26
Lead Director / Assistant Director	Rachel Egan (Assistant Director Regeneration and Property Services)	30/04/26
Financial Services	Debra Goodall (Assistant Director Finance and Customer Services)	30/04/26
Legal and Democratic Services	Nicola Cummings, Principal Solicitor – Governance Claire Green, Principal Solicitor – Contracts, Commercial and Procurement Jess Bayley-Hill – Principal Democratic Services Officer	01/05/26
Policy Team (if equalities implications apply)	Rebecca Green	29/04/26
Climate Change Team (if climate change implications apply)	Matthew Eccles	30/04/26

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MINUTES

Present:

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

Officers:

Debra Goodall, John Leach, Guy Revans and James Walton

Democratic Services Officers:

Eve Davies

124. APOLOGIES

There were no apologies for absence.

125. DECLARATIONS OF INTEREST

There were no declarations of interest.

126. LEADER'S ANNOUNCEMENTS

The Leader extended a welcome to James Walton on his appointment as the new Director of Finance and Section 151 Officer.

Additionally, Members were asked to note that there were two agenda packs for this meeting, the contents of which were clarified.

127. MINUTES

Prior to consideration of the minutes of the Executive Committee meeting held on 17th March 2026, the Leader announced that there was additional wording provided by the Interim Section 151 Officer following the publication of these minutes. It was suggested that the following wording be included for the Quarter 3 2025/26 Finance Monitoring Report:

- Paragraph four – 'In particular, reference was made to pressures within the Housing Revenue Account relating to the ability to fast track expenditure on fire doors, which represented a Health and Safety requirement it was noted this was an area for review

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the outcome of which would be reported to members in due course.'

- Paragraph seven – 'Reassurance was provided that service pressure requests affecting the current years financial position had been included within the new budget and that additional financial resources had been made available identified to support capacity in capital delivery if required.'

RESOLVED that

subject to the amendment detailed in the preamble above, the minutes of the Executive Committee meeting held on 17th March 2026 be approved.

128. VAT RECOVERY UPDATED POSITION

The Director of Finance and Section 151 Officer presented the VAT Recovery Updated Position report for the Executive Committee's consideration.

The report set out the current position in relation to longstanding VAT issues affecting both Bromsgrove District and Redditch Borough Councils. Members were advised that, between April 2021 and October 2024, the Council had been unable to submit periodic VAT returns for a number of reasons, including:

- Incorrect configuration of the cash receipting back office.
- Incorrect inter-entity processing within the TechOne Enterprise Resource Planning system.
- Incorrect payment and bank statement file processing.
- Failure to align work processes with the configuration of the TechOne VAT module.
- Staff turnover and a consequent period of lack of internal VAT expertise.
- Weak reconciliation processes.

The Committee was informed that an approach had been agreed with His Majesty's Revenue and Customs (HMRC) whereby the Council would submit nil returns for each outstanding period, followed by Error Correction Notices to reflect the returns that ought to have been submitted. It was noted that required reconciliations were being processed manually.

Officers reported that a repayment of £20,616,650 had been received from HMRC which, once offset against existing payments

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made, resulted in an overall net cash gain of £19,889,753 to the Council. While the improvement in the Council's cash position was welcomed, Members were advised that the underlying accounting transactions had already been recognised in the relevant prior financial years.

In respect of penalties, the Committee was notified that HMRC had agreed to suspend the financial penalties that would normally be applied in the event an organisation failed to submit timely and accurate VAT returns. This suspension was subject to the Council meeting a number of specified conditions, which were outlined to Members. As part of the proposed arrangements, it was requested that the Audit, Governance and Standards Committee provide oversight to ensure the appropriate delivery of those conditions.

Members were also updated on the Council's current VAT return process. It was reported that monthly VAT returns were now being submitted on time and that independent reviews of each return were undertaken prior to submission. The results of these reviews were presented to the Section 151 Officer or Deputy Section 151 Officer to confirm agreement to submit the return. Escalation procedures and sanctions were in place should these controls not be followed. Members were reassured that these arrangements represented a strengthened control environment and increased organisational resilience.

In concluding the presentation, officers summarised that the VAT position had been rectified, the Council had received substantial repayment from HMRC, and improved statutory compliance was now in place.

The Portfolio Holder for Finance welcomed the report and commented that the outcome would significantly reduce risk in both the short and long term, while also increasing confidence in financial projections for future years. He expressed his personal thanks to the Finance team for their work.

During consideration of the item, a question was raised regarding the length of time taken for VAT to be recovered from HMRC, given that returns had been submitted in December 2024. Officers explained that, due to the substantial sums involved, HMRC had undertaken extensive assurance checks. In addition, much of the VAT return process was manual, which required significant work to respond to HMRC queries and provide the necessary evidence. It was therefore clarified that completing the assurance process was inherently time-consuming.

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The Committee also placed on record its thanks to the System Implementation Support Consultant in recognition of his contribution in assisting the Council to resolve the VAT issues.

RESOLVED that

- 1) The resolutions of the outstanding VAT matters be noted;
- 2) The net cash gain position of £19,889,753 recovered by the Council following the HMRC repayment £20,616,650 received on the 3rd April 2026 offset by payments and receipts already made and received to/from HMRC of £726,897 be noted;
- 3) The mitigation of the cashflow risk be noted and the corporate risk register duly updated to reflect the positive change to the Council's cash holding position;
- 4) The penalty suspension conditions with HMRC be noted;
and
- 5) The Audit committee is requested to maintain oversight of the delivery of the actions to satisfy the agreed penalty suspension conditions.

129. OVERVIEW AND SCRUTINY COMMITTEE

Members considered the minutes of the meeting of the Overview and Scrutiny Committee held on 16th March 2026 and in doing so noted that there were no outstanding recommendations requiring consideration on this occasion.

RESOLVED that

the minutes of the meeting of the Overview and Scrutiny Committee held on 16th March 2026 be noted.

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

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

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- 131. TO CONSIDER ANY URGENT BUSINESS, DETAILS OF WHICH HAVE BEEN NOTIFIED TO THE ASSISTANT DIRECTOR 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 for discussion at the meeting.

- 132. EXCLUSION OF THE PRESS AND PUBLIC**

RESOLVED that

Under S100 A (4) of the Local Government Act 1972, as amended by the Local Government (Access to Information) (Variation) Order 2006, the public be excluded from the meeting for the following matters on the grounds that they involve the likely disclosure of exempt information as defined in paragraphs 3 of Part 1 of Schedule 12 of the said act, as amended.

- Minute Item No. 133 – HRA Business Plan Update to Enhance the Delivery of the Housing Improvement Plan**

- 133. HRA BUSINESS PLAN UPDATE TO ENHANCE THE DELIVERY OF THE HOUSING IMPROVEMENT PLAN**

The Executive Director for Environment and Communities presented the HRA Business Plan Update to Enhance the Delivery of the Housing Improvement Plan report.

The Committee was reminded that the Housing Revenue Account (HRA) was a ring-fenced account, primarily funded through rental income and associated service charges. In February 2023, the Executive had approved a thirty-year HRA Business Plan which established the long-term framework for managing and investing in social housing stock. The long-term capital forecasts within the plan had been informed by an independent Stock Condition Survey.

It was reported that Redditch Borough Council had received its regulatory judgement in July 2025 and had been issued with a C3 rating, indicating that substantial improvements were required. The judgement identified significant areas of weakness, including outstanding fire safety remedial actions, backlogs in repairs, gaps in transparency and oversight of performance reporting, and the absence of effective tenant scrutiny arrangements. Officers explained that these findings demonstrated the need for an

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accelerated approach to delivering the Council's Housing Improvement Plan.

Members were updated that Savills UK Limited had been commissioned to review the HRA Business Plan to identify any immediate headroom for additional investment, with a focus on expediting high-priority safety works, and to explore options for future growth.

Officers expressed the view that refreshing the Business Plan, followed by annual reviews, would provide the opportunity to increase investment. It was explained that income growth remained dependent on effective rent policy implementation, rent collection and the management of voids and arrears, all of which would be key considerations in future reviews of the Business Plan.

Members were also advised that refreshed data from rolling stock condition surveys would inform future planning. Given that a number of HRA loans were due to mature in the near future, scenario planning was required to manage these risks effectively.

The Committee was then informed of the next steps moving forward. Savills UK Limited would use a revised financial modelling tool to optimise affordable borrowing in order to accelerate delivery of the plan, expedite fire remediation works, and increase the size of the HRA's housing portfolio. A review of options would be undertaken to identify headroom and capacity to respond to repairs and maintenance demands. The aim was to accelerate the delivery of affordable social housing while maintaining regulatory compliance.

Once the report had been presented, Members discussed the following points in detail:

- The Portfolio Holder for Housing thanked the Executive Director for Environment and Communities for securing the value for money report from Savills UK Limited and welcomed the measures being taken to protect the HRA. It was noted that the Council held a unanimous position in support of the HRA and that Redditch Borough Council was the only authority in the county to have one.
- Members discussed the key highlights of the report.
- It was noted that a loan repayment of fifteen million pounds was due in 2027, reinforcing the need to invest in property acquisition to generate additional income. This would also increase the supply of homes for residents on the housing

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- register, with Members emphasising the importance of providing long-term, safe and warm housing for residents.
- Members highlighted the need for wider education to improve understanding of the HRA and the associated debt position. While the level of borrowing could appear high, it was noted that the HRA generated approximately twenty-six million pounds in income annually.
 - Members welcomed the standard of the report from Savills UK Limited.
 - It was noted that the Council would need to report to the Strategic Authority that it had a clear plan for delivering new homes.
 - Members queried whether officers felt there was flexibility in the local housing market to act quickly. Officers stated that the Strategic Housing team believed this was the best approach to increase housing stock.
 - Members expressed the view that the Regulator would regard the report positively, particularly in terms of strengthened governance arrangements.
 - Members asked how costs would be controlled and how capacity would be increased to secure external funding. Officers confirmed that robust budget management was in place and acknowledged wider sector pressures, particularly rising repair costs.
 - Further questions were raised regarding internal cost-control mechanisms and the identification of potential “quick wins”. Officers advised that an Internal Audit review of the Housing service was scheduled for later in 2026 and that this issue could be included within its scope. It was also noted that the Total Mobile system would provide improved data, including schedules of rates and quantities, to support stronger oversight.
 - Clarification was sought on assumptions within the thirty-year plan regarding roof replacements. Officers confirmed that survey work had been undertaken and that the majority of roofs were identified to require repair or no work rather than complete replacement. This work formed part of the rolling stock condition survey programme, which would provide improved insight into future maintenance requirements.
 - Members queried the robustness and flexibility of the financial modelling. Assurance was provided that officers were confident in the work undertaken by Savills UK Limited, although flexibility within the model would be reviewed

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further, particularly in light of the current geopolitical and economic climate.

- Members requested clarification as to why HRA debt could be viewed positively. Officers explained that HRA borrowing funded asset acquisition or creation, enabling the Council to grow both its housing stock and income. New properties were expected to have lower maintenance costs, while additional rental income would enable further investment in existing stock. The Section 151 Officer added that the durability of the income stream offset the associated borrowing risk, highlighting the balance between risk and opportunity.
- Changes to the Right to Buy scheme were discussed, with Members noting that lower discounts and longer qualifying periods were likely to reduce future applications. The Council had received an initial increase in requests following the announcement of the changes.
- Members commented that significant changes had occurred since the original Business Plan was approved and welcomed the proposed review as a positive step toward achieving objectives more quickly.
- Members queried progress in relation to Energy Performance Certificate (EPC) standards. Officers advised that an ongoing programme of improvement was in place, with progress being made, and that external funding was being sought to accelerate delivery where possible.
- The Committee welcomed the review of the Business Plan, noting that it was particularly appropriate given the C3 regulatory judgement, the Housing Improvement Plan, staffing changes, and increased investment. Members agreed that this represented a further step toward ensuring tenants lived in safe, high-quality homes.

RECOMMENDED that

- 1) The 30 year HRA Business Plan and associated Financial Model are reviewed, updated and as appropriate recalculated utilising modelling that ensures the Council's Housing Stock Portfolio is able to benefit from and perform to the highest standards possible;**

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- 2) **The high-level findings and risks identified in the report are reviewed and a revised HRA Business Plan is included in a future report; and**
- 3) **An annual review of the HRA Business Plan is undertaken and reported to Council.**

(During the consideration of this item, Members discussed matters that necessitated the disclosure of exempt information. It was therefore agreed to move to exclude the press and public prior to any debate on the grounds that information would be revealed relating to the financial and business affairs of any particular person (including the authority holding that information).

The Meeting commenced at 6.30 pm
and closed at 7.26 pm

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