

Report for: Cabinet - 11 November 2025

Item number: 18

Title: Housing Annual Compliance Assurance Statement

Report authorised by : Jahedur Rahman, Director of Housing

Lead Officer: Scott Kay – Assistant Director of Repairs & Compliance

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Key

1. Describe the issue under consideration

- 1.1 This report provides the annual assurance statement on the Housing Service's position against the 'big six' compliance areas (gas, electric, fire safety, asbestos, legionella and lifts) as set out to Cabinet on 18 April 2023 at section 3.6 in the report 'Housing Services Improvement Plan and Compliance Assurance Statement'.
- 1.2 One of the key priorities of the Housing Improvement Plan approved by Cabinet in April 2023 is improved compliance and carrying out an internal audit of these compliance indicators on a regular basis.
- 1.3 The Council's auditors Mazars carried out an audit of the service's compliance, reporting its performance against these indicators in March 2025. This report provides a summary of the outcome of this audit.

2. Cabinet Member Introduction

Every resident deserves a safe and secure home. Maintaining good quality, safe, warm, and sustainable council homes is a key priority for Haringey Council. This is our annual compliance report for 2024/25 against the 'big six' safety compliance areas – gas, electricity, fire safety, asbestos, legionella, and lifts.

One of the key priorities of Haringey Council's Housing Improvement Plan, approved by Cabinet in 2023, is to improve our compliance and reporting. The Council has since implemented a range of proactive safety and risk assessment programmes for all compliance activities. This is closely monitored through our governance process. On a monthly basis, the Council's internal Building Safety and Compliance Board are presented with a key performance indicator report on the 'big six' compliance areas.

We also seek out, through Mazars auditors, independent review and assessment of the quality of our reporting and assurance to ensure that it is accurate and

robust. This provides assurance to the public and to elected members that Council Executives and Officers are appropriately managing property related Health and Safety risks.

The Mazars audit reported a high level of accuracy whilst setting out a number of recommendations which the service are progressing, as set out in the report.

3. Recommendations

- 3.1 That Cabinet note the report and the continued improvements being made to provide further assurance in future.

4. Reasons for decision

- 4.1 The purpose of this report is to provide Cabinet and council tenants and leaseholders with the assurance and confidence that the Housing Service's arrangements for monitoring the 'big six' compliance areas are robust and are subject to ongoing review and improvement.

5. Alternative options considered

Not applicable.

6. Background information

- 6.1. In December 2022, the Council commissioned a Property Compliance Health Check to assess the approach to managing six compliance areas: gas and heating; electric; fire and building safety; asbestos; water, and lifts. The health check found several areas of non-compliance, with several key recommendations made, particularly around overdue fire risk actions and electrical safety.
- 6.2. In January 2023, the Council wrote to the Regulator of Social Housing (RSH), the body that provides independent oversight of all registered social housing providers including local authorities and housing associations and made a voluntary self-referral for a potential breach of the Home Standard.
- 6.3. At the time of the self-referral the Regulator was also aware that 30% of the council's housing stock did not meet the Decent Homes Standard.
- 6.4. The RSH assessed the evidence provided as part of the self-referral and confirmed that the Council had breached two parts of the Home Standard on the following grounds: non-compliance with the Decent Homes standard and the Council's identification of over one hundred Category 1 hazards; the high number of high risk fire risk assessments and actions outstanding; and the Council being unable to confirm that electrical inspection condition reports (EICRs) had been completed within the last ten years for around 4,000 properties.
- 6.5. As a result, the RSH published a Regulatory Notice on 6th March 2023. This notice remains "live" for 12 months or until full compliance is achieved.

- 6.6. A report was presented to Cabinet on 18 April 2023 detailing the reasons why the Council was in breach of the Homes Standard, and the Council's Improvement Plan to address and resolve the issues raised. A subsequent Cabinet report on 11 July 2023 described the additional step of entering into a Voluntary Undertaking – statutory health and safety, with the RSH to further demonstrate the Council's commitment to ensuring that we are working openly and transparently with the RSH with the aim of achieving full compliance and discharge of the Notice.
- 6.7. The Housing Services Improvement Plan and Compliance Assurance Statement report also set out the Council's commitment to produce an 'annual Housing Compliance Assurance Statement' - including an update on the Council's performance in the 'big six' areas of compliance with which the industry generally tracks performance with regards to the safety of homes within its ownership. It should be noted that these are not the only requirements with regards to safety, however the key ones to show adherence to standards. These are:
1. Gas
 2. Electrical
 3. Water/Legionella
 4. Lifts
 5. Asbestos
 6. Fire
- 6.8. On 11 July 2023 Cabinet authorised the Chief Executive to enter into a Voluntary Undertaking to the Housing Regulator under Section 125 of the Housing and Regeneration Act 2008.
- 6.9. **Table 1** below shows the compliance position for the six key compliance indicators as of December 2022. The Council subsequently made a self- referral to the Regulator of Social Housing in January 2023.

Table 1

Ref	Compliance Area	Percentage Compliance	No. of Properties Affected	Frequency	No. Complying
1.	Fire Risk Assessments (12-month rolling)	98.41%	1,637	Variable	1,611
2.	Gas Safety (LGSR) Domestic (GN, SH, HOS & PSL)	100.00%	14,736	Annual	14,736
3.	Electrical (EICR) (Domestic & Communal)	54.39%	15,962	5-yearly	8,681
4.	Asbestos Reinspections (Communal)	88.22%	781	Variable	689
5.	Passenger Lift Inspections (LOLER)	100.00%	149	Biannual	149
6.	Water Hygiene (L8) Risk Assessments	100.00%	487	Biennial	487

- 6.10. **Table 2** below shows the compliance position as at March 2025 and reflects the improvement in consistency of performance across all areas and specifically the improvement for Electrical Inspection Reports which have improved from 54.39% to 98.33%. Fire risk assessments have improved and although 2 were overdue in March this has remained consistently high, often achieving 100% compliance, with all properties being in a demonstrable managed process. Asbestos has continued to improve its overall position from 92 properties overdue in December 2022, to 0 properties in March 2025. Although the figures for gas and passenger lifts are just

below the 100% target figure, they are also in a managed process whereby evidence regarding access and communication with residents is available to ensure that as a responsible Landlord, Haringey Council is taking all reasonable steps within its powers to maintain the safety of its residents.

- 6.11. In addition to the improvements for safety inspections outlined above, we have been successfully reducing the number of remedial actions identified in them. We have reduced overdue fire safety actions by 7,948, and in particular high-risk overdue actions, that have reduced by more than 4,638 since our self-reporting.

Health & Safety Compliance - The Big '6'

P1 Summary 2024/25

March 2025

Ref	Compliance Area	Percentage Compliance	No. of Properties Affected	Frequency	No. Complying	Percentage Compliance last reported February 2025	Trend since previous report
1.	Fire Risk Assessments (12-month rolling)	99.88%	1,641	Variable	1,639	99.75%	↑
2.	Gas Safety (LGSR) Domestic (GN, SH, HOS & PSL)	99.94%	14,210	Annual	14,201	99.94%	↓
3.	Electrical (EICR) (Domestic & Communal)	98.33%	16,360	5-yearly	16,086	98.31%	↑
4.	Asbestos Reinspections (Communal)	100.00%	1,169	Variable	1,169	100.00%	↔
5.	Passenger Lift Inspections (LOLER)	99.34%	151	Biannual	150	100.00%	↓
6.	Water Hygiene (L8) Risk Assessments	100.00%	290	Biennial	290	100.00%	↔

- 6.12. In terms of March's performance:

- With regard to the 2 FRAs they have all since been completed
- For the 9 Gas safety records expired at the end of June, all are managed within our access process. Eight were completed during the following month under notice of legal action and one particularly difficult and vulnerable case is managed through tenancy management intervention, although there has been delays due to Court processes.
- All communal Electrical certificates were compliant, however there were 273 homes where there had been no response or engagement by the tenants forcing us to explore legal action through the Courts. The Council was successful in applying for Warrants and has since carried out further access attempts and enforcement to reduce the number to 262. Of these 231 have a certificate less than 10-years old. Further batches of warrant applications are being submitted monthly.
- At the time, 1 passenger lift had access difficulties due to repair works that had been carried out to the roof access ladder.

- 6.13. Access to properties for undertaking regulatory compliance testing is managed in accordance with our access policy and procedures. A specific procedure for Gas

Safety involves 3 stages of letters and then enforcement through the courts. During the interim period, every effort is made to contact the tenant and access the property both in and outside of normal working hours, in liaison with colleagues across different departments.

- 6.14. The access protocol is adopted for undertaking electrical inspections within tenants' homes. We have been successful in obtaining injunctions and since the previous year's annual assurance statement, warrants have been obtained for access for electrical inspections.
- 6.15. All other compliance involves accessing communal spaces for which we take a more direct approach of notifying residents who prevent access, e.g., by fitting additional locks to main entrance doors or service cupboards. Where required we will change locks and issue re-charges where appropriate. This approach has proved successful in both prompting residents to provide access and allowing us to gain access quickly with a locksmith in attendance.
- 6.16. One of the key priorities of the Housing Improvement Plan which was approved by Cabinet in April 2023 is improved compliance and one of the key actions was to: 'Ensure that your internal audit regime reviews all six compliance areas at least once every two years, and as a minimum, establishes whether Haringey is compliant with its legal and regulatory obligations.' This process continues with a recent internal audit for Fire Safety completed in September 2025 for which we are awaiting the Auditor's report.
- 6.17. In April 2025 Mazars, the Council's auditors, were tasked by the Director of Housing with undertaking the Annual Assurance audit for statutory compliance in accordance with the requirements of the Housing Improvement Plan action as above; to provide assurance the Borough of Haringey is reporting accurate key performance indicators in relation to areas of statutory compliance in response to the regulatory notice and other recommendations raised.
- 6.18. The audit covered the 'Big Six' areas of compliance regarding accuracy of reporting performance, action tracking and completeness of the inspection programmes.
- 6.19. For KPI reporting, Mazars' confirm the accuracy of the data for three of the six compliance areas with either only minor variances due to small data errors on the Excel Spreadsheet trackers used for reporting.
- 6.20. With regard to Electrical Inspections, there was a minor discrepancy of 0.03% which is an improvement on the previous year's audit which reported a "minor" discrepancy of 1%. This was also shown to be under reporting compliance rather than overstating our position. Within the Fire Risk assessment category there was a minor discrepancy of 0.8% between the KPI figures reported and the Mazars. All other areas of compliance were tested and confirmed as having no discrepancies, apart from Lifts. Due to the way in which lifts were managed at the time through a technical manager, using the contractor portal to hold data and certificates, management were unable to provide a copy of the March data used for collating the compliance report. This has since been rectified by widening the management

and storage of lifts data by the wider Mechanical and Electrical Team, and all data is now held within C365 to ensure no single point of failure as identified in the audit.

- 6.21. To confirm the accuracy of the reported data, Mazars performed sample testing on assessment certificates, to ascertain that the data presented within the programme trackers reconciled to the corresponding certification. The final element of the review aimed to assess the completeness of remedial action tracking, for the actions arising from the health and safety assessments across the 'big 6' compliance areas.
- 6.22. The report highlights some minor errors between dates on certificates and the corresponding dates held in trackers within their sample analysis. The report confirms that the errors are due to manual inputting errors regarding dates and date formatting. However, they also acknowledge that this has not affected our compliance reporting. Overall, the level of discrepancy for compliance demonstrates that the compliance performance reported monthly has not been materially affected.
- 6.23. Mazars have identified two key risks regarding the significant use of manual spreadsheets allowing for input error, and undefined expectations regarding remedial actions, and acknowledge the current work to implement the new Compliance Management System. This project commenced in February 2024 following the award of contract to the software provider. The system is now facilitating the management of programmes for all areas.
- 6.24. The new Compliance System, policies, processes and procedures along with a focussed data team, will greatly improve compliance management, monitoring and reporting. The new Compliance System will report compliance inspections and action management, based on the uploaded certificate and will automatically extract, record, allocate and report on actions without the need for spreadsheet-based action trackers.
- 6.25. Mazars' audit report is provided at Appendix 1, including the detailed findings, test results and management responses.

7. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'?

By meeting the compliance requirements and keeping residents safe in their homes the service is contributing to Theme 5 of the Corporate Delivery Plan – Homes for the Future, particularly the following outcome: **An improvement in the quality of housing and resident services in the social rented sector.**

8. Carbon and Climate Change

By maintaining accurate data compliance, Haringey can ensure the undertaking of regular servicing, maintenance, and safety checks, of gas appliances and other mechanical & electrical equipment. This ensures they are working safely,

reliably, and as efficiently as possible. By doing so, the Council is contributing to reducing carbon emissions through both optimum performance and minimal repair visits by engineers.

9. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

9.1 Finance

Finance notes the content of this report. There are no specific financial implications arising from this report on its own.

Financial and non-financial decisions to ensure compliance will go through the normal governance process.

9.2 Procurement

Strategic Procurement notes the contents of this report and confirms there are no immediate procurement related issues in respect of this report.

9.3 Director of Legal & Governance

9.3.1 The Director of Legal and Governance (Monitoring Officer) has been consulted in drafting the report.

9.3.2 The RSH has statutory responsibility for setting and enforcing housing standards in the social housing sector, including local authority housing.

9.3.3 As a registered provider of Social Housing the Council is required to comply with the consumer standards set by the RSH, these include the Home Standard.

9.3.4 Section 198A of the Housing and Regeneration Act 2008 enables the RSH to use its regulatory and enforcement powers if a registered provider such as the Council has failed to meet a consumer standard.

9.3.5 Following the Council's self-referral, the RSH was satisfied that the Council had breached Parts 1.1 and 1.2 of the Home Standard (see above), and that there was potential for serious detriment to Haringey's tenants, and issued a (non-statutory) Regulatory Notice¹.

9.3.6 The RSH though took a co-regulation approach and has been working with the Council as it seeks to remedy the breaches. In the event of failure by the Council, the RSH has a range of enforcement powers.

¹ Regulatory notices are issued in response to an event of regulatory importance (for example, a finding of a breach of...a consumer standard that has or may cause serious detriment) that [the RSH], in accordance with [its] obligation to be transparent, wish[es] to make public

9.3.7 The Director of Legal and Governance (Monitoring Officer) sees no legal reasons preventing Cabinet from approving the recommendation in the report.

9.4 Equality

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between people who share those protected characteristics and people who do not.
- Foster good relations between people who share those characteristics and people who do not.

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/fait, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

This report does not have any direct positive or negative equality impact. The Annual Housing Compliance Assurance Statement indirectly contributes to Haringey council's housing improvement plan. Black people, disabled people, women and those from a low socioeconomic background are over-represented in our social housing stock, so it is expected that it will have an indirect positive impact on those who share protected characteristics.

10. Use of Appendices

Mazars' Audit Report: Statutory Compliance KPI Assurance

11. Background papers

- 17 September 2024 Cabinet report Housing Services Improvement Plan and Assurance Statement: [Housing annual compliance assurance statement report.pdf](#)
- Agreement of voluntary undertaking with Regulator for Social Housing: https://www.minutes.haringey.gov.uk/documents/s140428/FINAL%20July%202023%20Voluntary%20Undertaking_17.17.pdf