

Housing Asset Management and Compliance Strategy

2025 - 2030



ASSET MANAGEMENT AND COMPLIANCE STRATEGY, 2025 – 2030

Foreword by Councillor Vicki Smith, Cabinet Member for Housing and Sustainable Development



Welcome to Sandwell Council's Housing Asset Management and Compliance Strategy 2025 to 2030.

The Council holds a diverse portfolio with a wide range of assets that it either owns or occupies, with some operating commercially, all of which require consideration in terms of their management. This strategic document will guide future decisions associated with the use, acquisition and disposal of the Council's property assets over the next five years. It will assist the local authority in providing high-quality and cost-effective services and a key component in ensuring best value is achieved at all times.

This Asset Management and Compliance Strategy reflects the objectives of our Council Plan 2024–2027, our response to budget pressures and increasing demands on services. Sandwell Council's Place Directorate needs to provide its teams and services with the physical assets required to deliver our strategic objectives and operational priorities; and in doing so, will support tenants, residents and staff to realise our collective ambitions. These aspirations are necessary to improve our operational efficiency and financial performance.

As a registered social landlord, we need to ensure we are meeting the legal obligations we have as a landlord and as an employer. This is critical in enabling us to deliver our strategic goals and to provide quality and safe homes for our residents. This policy document confirms our objectives and intent. It also goes on to describe how we organise ourselves to meet this objective, our headline commitments, and how we report performance.

In addition, the Council has a clear focus on sustainability and this strategic plan seeks to build on the Council's 'Carbon Neutral by 2030' commitment and improve energy efficiency within its estate, whilst optimising financial return.

The Asset Management and Compliance Strategy will support the Council in the delivery of its corporate priorities over the next five years and will assist in ensuring that the portfolio is effectively managed. Despite the economic, social and regulatory challenges ahead, I am confident that this strategy will succeed in its aim of providing a framework for progress over the next few years in delivering the homes we need, as well as identifying additional opportunities for further progress in this important area.

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INTRODUCTION

Having a warm, safe and secure home in a thriving and attractive environment is vital for the health, wellbeing and life chances of people who live in Sandwell.

The aim of the Asset Management and Compliance Strategy is to guide the future shape and direction of the property assets to ensure that they meet corporate objectives, tenant expectations and legal obligations. This strategy sets out how we intend to address the key asset management challenges affecting our communities over the next five years. It sets out the Council's priorities and objectives for meeting housing need and working with tenants and residents to build sustainable and cohesive communities across the borough.

The National Housing Federation definition of property asset management is: **'Asset management is the range of activities undertaken to ensure that the housing stock meets the needs and standards for the future'**.

The principles of effective asset management therefore go beyond just investing in good repairs and improvements and must consider reviewing the overall asset base to ensure it achieves the right balance between need and quality.

The key objective of the Council's Asset Management and Compliance Strategy is to ensure that we utilise our assets in the most effective way for the benefit of both its existing and potential residents and the Council. By achieving the strategic housing objectives set out in this strategy, we will support the delivery of the commitments in the Council Plan 2024-2027, specifically on the themes of 'Living in Sandwell', 'Healthy in Sandwell' and 'Thriving Economy in Sandwell'.

Living in Sandwell

- Clean, well maintained public spaces and assets.
- Quality green spaces.
- Residents feel safe in their communities during the day and at night.
- Safe and affordable homes.
- Improve outcomes for local people on local issues.
- Residents have resilience to achieve real change in financial circumstances.

Healthy in Sandwell

- People to lead healthy lives in their community and live well for longer
- People remain as independent as possible for as long as possible and lead fulfilled lives (re-ablement).
- Residents are protected from harms to their health and wellbeing.
- Health outcomes for Sandwell's most vulnerable groups are improved and health inequalities are reduced.

Thriving Economy in Sandwell

- Encourage a positive environment where businesses and our community and voluntary organisations are supported to grow; and investment into the borough is maximised, creating job opportunities for local residents.
- Sandwell will be a net zero council by 2030 and a net zero borough by 2041.
- Good homes that are well connected.
- A thriving cultural, heritage and leisure offer.



INTRODUCTION

The Housing Asset Management and Compliance Strategy 2025–2030 will help meet the needs identified in the Council’s Housing Strategy, Housing Revenue Account 30-year Business Plan, Climate Change Strategy and Regeneration Strategy but also other emerging strategies and plans where housing has a part to play in meeting the needs and aspirations of our communities. This data and intelligence has also been coupled with the voice of our residents and we have consulted widely before finalising the strategy for adoption. By involving local communities in the process, we can develop sustainable and effective solutions that meet the needs of everyone in the community.

Ultimately, the vision for the Strategy states that our homes should be so much more than just bricks and mortar. Places to feel safe and secure, where communities thrive and grow. This includes providing high quality, energy efficient homes, alongside a housing service that is customer focused, supportive, accountable and professional.



This strategy also seeks to ensure we are working with our partners, stakeholders, community groups and residents to build a child-friendly borough in Sandwell. In order to achieve our Council Plan objectives around ‘Growing up in Sandwell’, good quality and suitable stock will be essential in helping to deliver this. In particular, decent homes will have a positive impact on the lives of children by keeping them safe, whereas being able to enjoy quality public spaces will provide a positive impact to their health and wellbeing. In addition, the Asset Management team will aim to support Children’s Services to make improvements to their own accommodation on a case-by-case basis.

We begin by outlining the background, context and scope that has informed this strategy. In addition, we have ensured the strategy reflects the national changes to housing, welfare and planning policy that have taken place in recent years at a national, regional and local level.



The document then lays out how it will maintain and improve its housing assets. This includes housing, commercial property, garages, and other associated pieces of land.

Lastly, we set out the action planning, governance and monitoring arrangements which will ensure we deliver on these strategic priorities.

KEY ACHIEVEMENTS

The last Housing Asset Management Strategy was produced in 2017 and there have been a number of achievements as a result of the previous document. Included in the progress made is the delivery of new affordable homes, improving existing homes, mitigating climate change and contributing to health and wellbeing outcomes:



Adaptations completed on over 2,500 council owned properties to address disability needs in housing stock across the borough.



Drawn on external funding in order to award over 500 grants for heating or boiler repairs and over 100 grants to tackle urgent disrepair.



Since February 2019, we have invested in around 5,000 homes to improve their energy efficiency by replacing roofs, doors and windows and installing roof and external / cavity wall insulation.



We have repaired and re-let around 1,400 homes annually.



Around 115,000 responsive repairs and around 42,000 emergency/urgent repairs were completed annually.



£2.1m of funding from the Department for Levelling Up, Housing, and Communities (DLUHC) for the Social Housing Decency Funding Grant.



Implementation of a new 30 Year Business Plan. This sets out our strategic plan for managing and maintaining our social housing homes.



Completed over 110,000 responsive repairs annually.



Reviewed and produced Sandwell's Housing Strategy for the period 2023 to 2028. This will be actively monitored throughout the period.



BACKGROUND

Housing assets are all assets that are on land owned and managed by the Housing Revenue Account (HRA):

- The Housing Revenue Account is the financial account used to manage the Council's activities as a landlord. It is a ring-fenced account and can only be used to provide services to council housing tenants through the collection of rent and other service charges.
- Asset management is the range of activities we undertake to ensure that our housing properties (assets) meet the current associated needs and standards. The Council's HRA assets includes dwellings let on secure tenancies, leasehold interests and other associated pieces of land.

Since the introduction in 2012 of Housing Revenue Account Self-Financing (which resulted in a loan settlement for Sandwell Council of £504million). The local authority has had a greater degree of control over the use and management of the HRA. Self-financing allowed decision making at a local level to drive planning for investment in housing stock and set spending priorities in line with local demand for repairs.

The most recent strategy produced was for the period 2017–2020. There is a need to review the strategy and provide a robust plan for the management of HRA assets to provide more detailed financial forecasting and to provide a consistent transparent approach to how the assets are invested in and the priorities driving how the HRA is spent.



BACKGROUND

Currently the Council has very limited up to date data on the condition of its stock/assets and the understanding of our properties from evidence-based data. We have committed to a condition survey of our stock, initially targeting 14,000 properties by the end of 2025 to provide a revised baseline from which to project future demand and investment needs. This is key to understand the work needed to keep them in a decent condition, safe and energy efficient alongside our residents' priorities for their homes. This limited data impinges on the ability to provide a detailed strategy for investment meeting the legislative requirements. However, we will undertake regular reviews of our stock, including commissioning borough wide condition surveys as necessary to ensure our data is no more than 5 years old. This approach will support the asset management function, with this document setting the strategic direction and a more robust delivery plan being developed over the next five years as more quality data is collected.

This document is supported by an action plan, set out at Appendix One, that details the activities required to deliver the evidence-based strategy.

This strategy sets out the key areas for managing the assets, ensuring it links closely to our objectives, and highlights risk and opportunities around all our HRA assets.



Our current strategic approach aims include:

- Providing homes which will be more affordable running costs to our residents.
- Developing a more environmentally sustainable asset base.
- Reducing the 'whole life' running costs of our properties.
- Demonstrating value for money through collaborative procurement & partnerships.
- Investing strategically in our homes and neighbourhoods.
- Appropriately disposing of assets, enabling investment in new homes & reinvestment in existing homes.
- Creating homes and neighbourhoods that meet our tenants and residents' needs and expectations both now and in the future.
- Meeting our commitments to building safety compliance in order to keep residents safe.

SCOPE AND PURPOSE

Scope

This document details the approach to managing, maintaining, investing in, and reviewing our homes, land and other associated assets. This document also explains a range of flexible approaches put in place to maintain, improve and develop our housing assets over the short, medium, and longer term, highlighting areas for improvement and review.

The key steps to developing and implementing the robust Asset Management and Compliance Strategy for HRA assets are all based upon information and intelligence gathering, with the following factors all influencing the strategy:

- Political and Corporate Drivers
- Stock Condition Information
- Intelligence from the industry including workforce, supply chain, material costs
- Resident insight
- Budgetary information – forecasting with market influences.

Once the above are known in full we will develop:

- An investment plan – to deliver a detailed 30-year plan based on the demand and the available budget including availability of grant funding.
- Implementation plan – to detail the delivery model and prioritised timeline for investment authorised by a Cabinet Report.

Purpose

The Asset Management and Compliance Strategy will contribute to delivery of our corporate and directorate business plans. It structures our ability to deliver three core components of asset management:

- Stock investment: Investing to maintain the stock to a standard that meets tenant and leaseholder needs and regulatory requirements including building safety.
- Active Asset Management: Activities to improve the performance of assets that have a poor social, economic or environmental performance, because of low demand or high costs, and either repairing them, or replacing elements to ensure they are fit for purpose.
- Supporting wider objectives: Being clear where and how asset management is supporting wider objectives, such as, energy efficiency, increasing the supply of new homes and creating sustainable communities.

STRATEGIC PRIORITIES

This Strategy concentrates on three key themes, each with an overarching strategic objective. These themes contain a range of activities, some which will be considered as 'Business as Usual' and others which will drive innovation, cultural change and moving the Council into a more pro-active asset management position.



Modern Homes and Energy Efficiency

Providing homes which are warm, secure, high quality, energy efficient and affordable.



Asset Compliance and Building Safety

Ensuring our properties are safe, secure and compliant, meeting all our landlord obligations under current legislation, guidance and best practice.



Planning and Service Delivery

Understanding our properties and tenants to drive constant performance improvement and innovation. Also, maximising choice for tenants on investment priorities and specification of components at replacement.

Each theme is designed to be cross-cutting, in that it will be addressed through all workstreams and contributed to by all areas of Asset Management team and wider organisation. Due to the current environment where there are competing priorities and resources it is critical that any investment considers all facets of the asset rather than be driven by a particular programme or budget.

Actions resulting from this Strategy will be linked to one of these key themes, with a clear target. These actions will be used as a Golden Thread, reflected in service, team and individual objectives, giving clear responsibility and accountability for delivery.

CONTEXT

National context

The current economic conditions, with high inflation and interest rates, present affordability challenges for our residents, and for our business plan. There are limits (e.g. rent caps) on the extent to which we can increase our income in line with inflation. Resources in our business plan will be constrained and this strategy sets out the challenges that need to be overcome.

The housing sector is currently facing several complex and diverse challenges including increased building industry costs, higher interest rates, a cost-of-living crisis (including increasing energy costs) for our residents, alongside an increased demand on housing need and customer expectation, and new legislative requirements that all Housing Services are facing. There are several key national strategic factors, which will influence how we manage our assets such as housing growth and climate change and the low carbon future. This strategy, therefore, needs to understand and respond to them, considering the local context and the scope for investment within the constraints of the HRA Business Plan and Building Safety regulations.

Housing Growth

The Government and the Regulator of Social Housing (RSH) have set a clear expectation that social landlords should use any increased rental income generated as a result of a return to annual rent rises to continue to invest in existing homes (capital improvement) and deliver new homes. These rent rises have been re-introduced due to the implications of the reduction in rents between 2016 and 2020 had seen our finances significantly impacted.

Addressing the housing shortage is a priority issue for the government as well as the Council and one that carries clear expectations on how housing supply is increased to meet local housing needs.

In 2023/24, 8,121 applications were made for affordable homes in Sandwell, of those only 2,877 (35%) qualified to join our Housing Register. Over the same period 1,449 properties became available during that year, a clear indication that demand continues to outstrip supply in Sandwell by some margin. The lack of affordable housing is a national issue and the government have set out a number of initiatives to support people into achieving home ownership as well as supporting local authorities to deliver new homes. The Council will continue to prioritise the delivery of new homes alongside remodelling redundant space within existing assets to create new homes.

However, the increasing number of emerging sector priorities, such as net zero carbon and building safety, is increasing the complexity of our investment levels decisions. It is recognised that these competing priorities, demands and legislation will change during this time and will potentially impact the extent to which we can deliver on our objectives that currently exist.

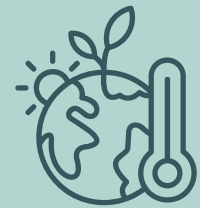
CONTEXT

Climate Change and the Low Carbon Future

Emissions from homes are estimated to account for 22% of all UK carbon emissions (including consumed electricity), and social housing contributes 10% of this. The Government has made commitments to tackle climate change including the 2017 Clean Growth Strategy which set the requirement for registered providers to achieve EPC C by 2030[1]. At the time of writing, the Government is also reviewing the Decent Homes Standard which will have requirements for broader changes and investment. The Regulator of Social Housing (RSH) expects social landlords to be working to understand the actual costs of making carbon reduction improvements to our assets. With the vast majority of our current stock built before 1990, the costs of achieving EPC C are likely to be significant, requiring retrofit measures such as improved insulation, more efficient heating and hot water systems and microgeneration systems (e.g., solar panels).

By 2025, new build homes will need to be low carbon and energy efficient. These new technologies will incur additional construction costs as well as increased ongoing repair, maintenance and component renewals throughout the life of the property.

[1] An EPC gives a property an energy efficiency rating from A (most efficient) to G (least efficient) and is valid for 10 years.



LEGAL AND POLICY CONTEXT

There are a variety of national and local factors that have to be considered which underpin the strategy.

Building Safety

Tragic events such as the Grenfell Fire have increased the Government's and the RSH's focus on building safety, maintenance, internal governance, and the importance of resident engagement. The subsequent public inquiries and reviews have brought increased scrutiny of the approach to building management, investment, and maintenance of high-rise blocks, but also the wider issue of ensuring the safety of tenants and others.

Significant changes to our legal obligations became law during 2021 through the Fire Safety Act 2021 and the Building Safety Act 2022. Extensive work has been undertaken in 2021 and 2022 across the stock and we will continue our work to uphold and strengthen how we maintain the safety of residents through our management of higher risk buildings.

Regulatory Standards

The Social Housing (Regulation) Act, which was introduced to parliament in July 2023, forms a new era of regulation for the social housing sector, aiming to give residents greater powers and improve access to quick and fair solutions to problems.

The regulator's powers have also been widened so that failure to comply with the regulatory standards enables it to take regulatory action. These powers include:

- setting criteria in relation to meeting regulatory standards on registration as a new provider;
- deregistering a registered provider that has failed to comply with the regulatory standards;
- entering premises, giving at least 48 hours' notice (rather than 28 days as previously provided), to carry out a survey of the condition of the premises;
- once a survey has been carried out, entering premises to undertake emergency remedial action where there is imminent risk of serious harm to the health or safety of tenants;
- requiring a registered provider to implement a performance improvement plan;
- setting competency and conduct standards for staff working for registered providers;
- issuing unlimited fines to registered providers (there was previously a cap of £5,000); and
- appointing a manager which is no longer restricted to an individual, so a corporate body can therefore be appointed.

LEGAL AND POLICY CONTEXT

New Consumer Standards

As part of the Regulatory Standards, from 1 April 2024, the regulator has moved from a reactive approach to consumer regulation, where it can only investigate consumer issues if there is 'a serious detriment' to tenants, to a proactive approach on the same 'co-regulatory' basis as it regulates economic standards. In response to their new inspection powers, when carrying out inspections of registered providers, the RSH will have a new focus on compliance with consumer standards. It is essential that Sandwell Council is able to demonstrate compliance across all areas of the consumer standards.

The four consumer standards are:

- The Safety and Quality Standard which requires landlords to provide safe and good-quality homes for their tenants, along with good-quality landlord services.
- The Transparency, Influence and Accountability Standard which requires landlords to be open with tenants and treat them with fairness and respect so they can access services, raise concerns when necessary, influence decision making and hold their landlord to account.
- The Neighbourhood and Community Standard which requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods, and feel safe in their homes.
- The Tenancy Standard which sets requirements for the fair allocation and letting of homes, as well as requirements for how tenancies are managed by landlords.

This applies to the breadth of our asset management activity including the delivery of responsive and cyclical repairs, responsible neighbourhood management, planned maintenance and the HRA Capital Programme, work on vacant properties and the delivery of aids and adaptations.

Decent Homes Standard

The 2020 Social Housing White Paper confirmed a review of the Decent Homes Standard, the first time the Standard has been updated since 2006. The first phase of the review – focused on establishing a case for change to the current standard – concluded in Autumn 2021. Phase 2 of the review focused on the development of a new Standard, has now begun.

LEGAL AND POLICY CONTEXT

Awaab's Law

Awaab's Law, which was also introduced in the landmark Social Housing Regulation Act 2023, will require social housing landlords such as Sandwell Council to follow strict timescales to inspect and repair hazards, including damp and mould.

The proposed legal requirements for social landlords will mean they must investigate hazards within 14 days, start fixing within a further seven days, and make emergency repairs in 24 hours.

Awaab's Law will form part of the social housing tenancy agreement, meaning tenants will be able to hold their landlord to account if they fail to comply. Failure to adhere to the required timescales would make the landlord liable for breach of tenancy, resulting in fines or legal action, in addition to being responsible for putting their tenant's safety at risk. The Act also makes provision for requiring the landlord to provide safe alternative accommodation for the tenant, at no cost to them.



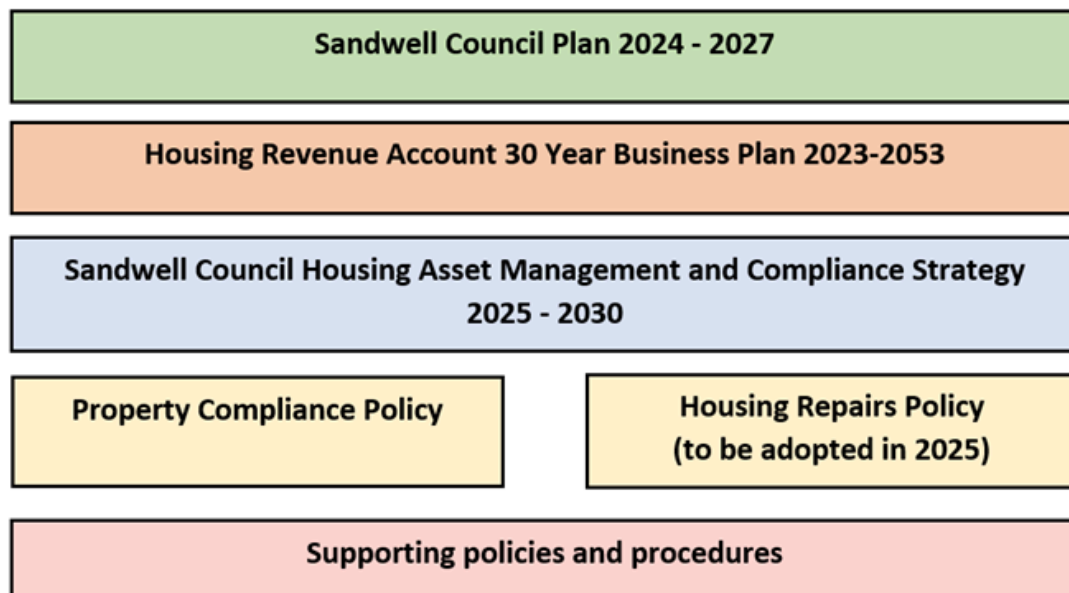
STRATEGIC AND POLICY ALIGNMENT

The Council's vision, as set out in the Council Plan 2024 – 2027, focusses on strategic themes such as 'Living in Sandwell' and 'Healthy in Sandwell'. By addressing these objectives in this strategy, we will support these commitments.

The Housing Asset Management and Compliance Strategy will align with our policies and strategies but will also influence and guide a range of supporting or inter-related strategies, plans and policies. This will ensure that the management of our assets is part of a wider approach to delivering high quality services and places for the benefit of our residents. The key documents that should be read in conjunction with this strategy include:

- [Sandwell Council Plan 2024 – 2027](#)
- [Sandwell MBC Local Development Scheme 2024](#)
- [Sandwell Regeneration Strategy 2022 – 2027](#)
- [Housing Revenue Account 30 Year Business Plan 2023-2053](#)
- [Sandwell Housing Strategy 2023 – 2028](#)
- [Property Compliance Policy](#)
- [Policy on Adaptations for Disabled Tenants in Council Housing](#)
- [Housing Repairs and Maintenance Policy](#)

We must ensure that the hierarchy of policies and strategies informs our approach to Asset Management and Compliance.



EQUALITY, DIVERSITY AND INCLUSION

Sandwell is committed to ensuring that services are provided that embrace diversity and promote equality of opportunity and access.

We know that poor housing conditions disproportionately affect some communities, for example ethnic minority groups are disproportionately represented on the housing register and more likely to be living in poorer housing conditions.

All policies and procedures will seek to eliminate inequality and unlawful discrimination, recognise and promote cohesion, good community relations and equal opportunities. The strategy will consider the needs and rights of all protected characteristics and take steps to address any discrimination they may face. As a result, we will seek to continue to improve our monitoring of how well our services are addressing these issues and react to changing trends.

REASONABLE ADJUSTMENTS

Sandwell Council is committed to ensuring that all residents, including those with disabilities, have equal access to our services. The Council recognises its legal obligation to make reasonable adjustments to its services and facilities to remove barriers and ensure that disabled people can participate fully in public life.

The Council strives to ensure that the way it works does not place a specific person with disabilities at a disadvantage. The Equality Act 2010 calls on organisations to take such steps as it is reasonable to have to take to avoid the disadvantage. This is to ensure that individuals receive the same quality and level of service as someone without a disability, where this is possible.

Reasonable adjustments are changes made to the Council's usual practices or provision of services to reduce the disadvantage that disabled people may face in accessing them. The adjustments made will depend on the specific needs of the individual and the situation.

As part of Sandwell Council's corporate approach to improve both the accessibility of Council services and the quality of service we deliver; we will make sure that Sandwell people get a good quality, consistent level of service, however they choose to contact the Council.

There is no prescribed list of reasonable adjustments; the adjustment will depend on the individual's needs. Sandwell's Housing and Asset Management Services will discuss the requirements with the person concerned and seek to reach agreement on what may be reasonable in the circumstances. We will not make assumptions about whether a disabled person requires any reasonable adjustments or about what those adjustments should be.

For more information, please refer to Sandwell Council's [Reasonable Adjustments Policy](#).

THE CURRENT STOCK PORTFOLIO

Residential Property

In October 2024, our housing stock consisted of 27,668 properties (these figures include the private finance initiative area of Harvills Hawthorn).

There are also the freeholder of buildings in which there are 1,370 leasehold properties across the borough. In addition, we have 141 properties used for temporary accommodation and an additional 196 for supported housing.

Housing Stock Profile



1,564
Bungalows.



14,746
Houses.



10,707
Flats.

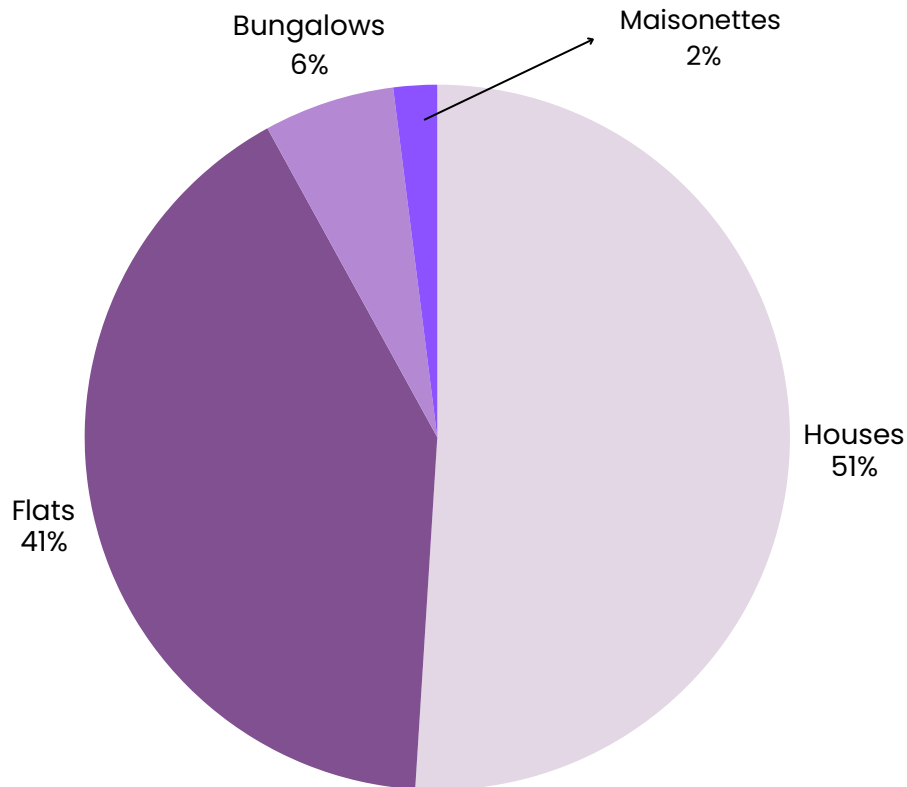


651
Maisonettes.

These properties are managed through our own Housing Services (these figures include the private finance initiative area of Harvills Hawthorn).



THE CURRENT STOCK PORTFOLIO



Housing council stock mix by Town Area [as of October 2024]

The mix of property types affects the management and investment requirements of our stock. It also affects how well it aligns with local need and demand. Council stock distribution by town area is uneven, with Wednesbury sharing the lowest at just over 12% and West Bromwich accommodating the highest share at just under 26%. By stock type, 53% of bungalows are located in Wednesbury and West Bromwich, whilst 56% of maisonettes are sited in Smethwick. Just under a third of flats are located in West Bromwich with Wednesbury having the lowest share at 7.0%. Houses as a stock type are more evenly distributed.

THE CURRENT STOCK PORTFOLIO

Town Area	Bungalow	Flat	House	Maisonette	Total
Oldbury	157	1,757	1,999	27	3,940
Rowley	196	1,804	2,903	0	4,903
Smethwick	135	1,161	1,746	365	3,407
Tipton	251	1,948	2,571	180	4,950
Wednesbury	298	701	2,348	16	3,363527
West Bromwich	527	3,336	3,179	63	7,105
Grand Total	1,564	10,707	14,746	651	27,668**

* = *3,040 flats are categorised as high-rise.

** = Figures provided are for SMBC stock and PFI Riverside.

Leaseholders

Whilst we have a relatively small proportion of leasehold properties, ensuring that we manage our services and relationships is vitally important. We hold a legal responsibility with leaseholders to maintain and renew the communal areas and external envelope of their homes. We must meet the requirements of the leases held and ensure that we are providing value for money and will consult with leaseholders regarding any planned improvement works.

Other HRA Assets

69 play areas

Vacant land

MANAGING THE ASSETS

Housing Stock

Repairs and Maintenance

The council is committed to delivering a high-quality, value for money, modern and effective repairs and maintenance service and to provide homes that are comfortable, maintained, and safe for people to live in.

Sandwell has a direct labour organisation (DLO) of staff who are responsible for the repairs and maintenance of all HRA assets. Repairs are also supported by external contractors to deal with peaks in demand. The purpose of this function is to maintain the condition of the council's assets providing a quality asset for the expected lifecycle of the component – this is the main service that maintains our assets.

The Housing Service delivers circa 110,000 responsive repairs each year alongside cyclical maintenance and capital works; this demonstrates a significant investment over the lifetime of the HRA Business Plan. Performance of the DLO is monitored to ensure the aims and objectives are met, whilst achieving value for money with effective resource management.

Repairs and maintenance activity is a significant driver of tenant and leaseholder satisfaction. The Repairs Service is accessed by most tenants and is highly valued. It is a key service with significant scrutiny.

Our principal aims are:

- To make sure we provide an effective, modern repairs service that tenants and leaseholders can rely on, responding quickly when the need arises.
- To have in place well designed repair and maintenance systems that ensure homes are safe, kept in repair and brought up to, or continue to meet, agreed standards.
- To ensure we repair and maintain the housing stock and communal areas in a way that optimises the use of financial, staffing and other resources and achieves value for money.
- To maximise choice for tenants on investment priorities and component replacement.
- To comply with relevant statutory and regulatory obligations.
- To deliver a repairs service which provides an effective balance between reactive and planned works.

MANAGING THE ASSETS

Health and Safety

Sandwell Council already has a responsibility in accordance with the Housing Act 2004 to ensure that all residential dwellings are designed, constructed and maintained free from both unnecessary and unavoidable health and safety risks.

The government has proposed that Awaab's Law will introduce timescales across all 29 Health and Safety Rating System (HHSRS) hazards. The HHSRS operates by evaluating the potential risk of harm to an actual or potential occupier, is based on the risk to a particular age group over another and is a means of rating the danger posed by a health and safety hazard.

As part of Sandwell Council's operations, any risks, including any properties with defects which have a high-risk Housing Health & Safety Rating System (HHSRS) hazard identified during an inspection or visit, are actioned immediately to avoid or minimise any hazard which is identified. This is part of the repairs and maintenance function, however any improvement identified as a result of this will be carried out as a Capital Improvement as a priority.



MANAGING THE ASSETS

Gas and Servicing

To adhere to the Landlords main duties as listed in “A guide to landlords’ duties: Gas Safety (Installation and Use) Regulations 1998 As amended”.

The repairs and maintenance function are also responsible for an annual inspection of landlord owned gas appliances. This is in accordance with Regulation 36 of the Gas Safety (Installation and Use) Regulations 1998, which places a duty on landlords to ensure that it’s gas appliances, installation pipework and flue systems are maintained in a safe condition.

Under the Health and Safety at work act (Section 3) Sandwell MBC, as a landlord is also obligated to ensure that any flue system that we own that serves a tenant’s own appliance is maintained and can safely remove any products of combustion. Where it is the case that a tenant owned appliance is connected to a chimney system we own we also service that appliance as part of best practice.

We take the same approach to flue systems where a solid fuel appliance is encountered that a tenant has had installed, where we also provide 2 safety inspections a year and 1 chimney sweep.

We also provide a responsive repairs service to our tenants where our gas appliances or heating systems breakdown. Where a gas appliance is found to be beyond economical repair or parts are obsolete, we replace the appliance and where necessary make upgrades to the system via capital improvements.

Electrical Test and Inspect

As best practice, we are ensuring electrical installations in properties are inspected and tested by a person who is qualified and competent, at a five year interval or sooner if the validity is less.

The Regulations state that a landlord must ensure that electrical safety standards are met, and that investigative or remedial work is carried out if the report requires this.

Landlords must obtain a report (SMBC carry out an Electrical Installation Condition Report or EICR) from the person conducting the inspection and test which explains its outcomes and any investigative or remedial work required.

The electrical installation should be safe for continued use. In practice, if the report does not require investigative or remedial work, the landlord will not be required to carry out any further work.



MANAGING THE ASSETS

Damp, Condensation and Mould

The inclusion of Awaab's Law within the Social Housing Regulation Act 2023 places a spotlight on the severity of damp and mould as a hazard in social housing and highlights the government's commitment to taking tenants' health and safety seriously.

As outlined, the government has proposed that Awaab's Law will introduce timescales across all 29 Health and Safety Rating System (HHSRS) hazards. The proposed legal requirements for social landlords will mean they must investigate hazards within 14 days, start fixing within a further seven days, and make emergency repairs in 24 hours for all category 1 hazards. As part of our commitment to ensuring tenant safety, a zero-tolerance approach to damp and mould will be undertaken.

Initially, we respond to reports of damp and mould on a reactive basis. This means that we will investigate after a tenant has reported an issue to us, or where a hazard has been identified by a surveyor under Hazard Rating System.

As part of the improvement planning process, we will analyse our repair data to determine whether we have a particular issue in certain locations, or with a certain type of property. This may lead to a focussed investment to proactively deal with damp and mould in certain properties including investing in innovative solutions for ventilation and digital monitoring. We also take steps to address high levels of humidity in our properties by installing humidity-controlled extractor fans as a priority.

Other Compliance Areas

Sandwell Metropolitan Borough Council (SMBC) will adhere to all relevant legislation under The Health and Safety at Work Act and related such as the Housing Act 2004, the Management of Health and Safety at work Regulations 1999, Building Regulations and the approved documents etc. Specifically for the below as detailed in the compliance policy:

- Water – Control of Substances Harmful to Health (CoSHH)
- Asbestos – Control of Asbestos Regulations (CAR)
- Passenger Lifts – Lifting Operations & Lifting Equipment Regulations (LOLER)
- Provision and Use of Work Equipment Regs 1998 (PUWER)
- Fire Safety – Fire Safety Order 2005
- The Fire Safety England Regs 22

MANAGING THE ASSETS

Water – Control of Substances Harmful to Health (CoSHH)



Risk assessments must be carried out to assess any risks and to minimise harm. If employers fail to control hazardous substances this can lead to staff becoming ill from mild eye irritation to chronic lung disease and could lead to civil prosecution, loss of productivity, enforcement action and reputational damage. Legionella is a biological agent and is a hazardous substance under CoSHH.

Asbestos – Control of Asbestos Regulations (CAR)

Sets minimum standards for the protection of employees from the risks of exposure to Asbestos Containing Materials, ACM.s. Applies to work which disturbs or is likely to disturb ACM, ACM sampling and laboratory analysis.

Passenger Lifts – Lifting Operations & Lifting Equipment Regulations (LOLER)

Places duties upon persons and organisations who own, operate, provide, or have control over lifting equipment. To ensure it is fit for purpose, appropriate for the task, suitably marked and in many cases subject to statutory periodic thorough examination.

Provision and use of work Equipment Regs 1998 (PUWER)

Requires for equipment provided for work use: Suitable for the intended use; Safe for use, maintained and inspected to ensure correctly installed and does not deteriorate; Used only by people who have had adequate information, instruction, and training; Accommodated by suitable H&S measures; Used in accordance with specific requirements for mobile work equipment.

Fire Safety – Fire Safety Order 2005

To adhere to all Landlords Duties including articles 8-24. Noting 8 and 9 below. Has been updated by the Fire Safety Act 21 – to include external wall and attachments in the FRA.

8. Duty to take general fire precautions

9. Risk assessment



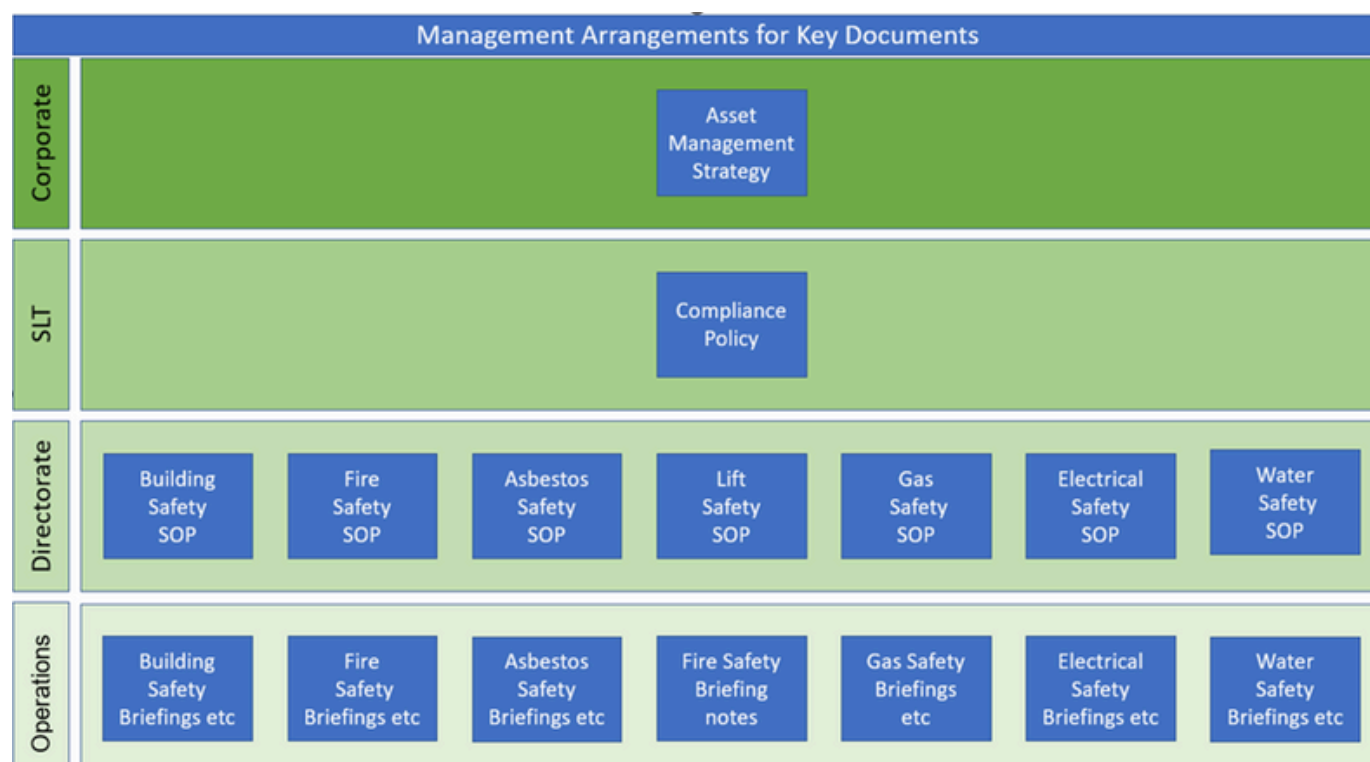
MANAGING THE ASSETS

The Fire Safety England Regs 22

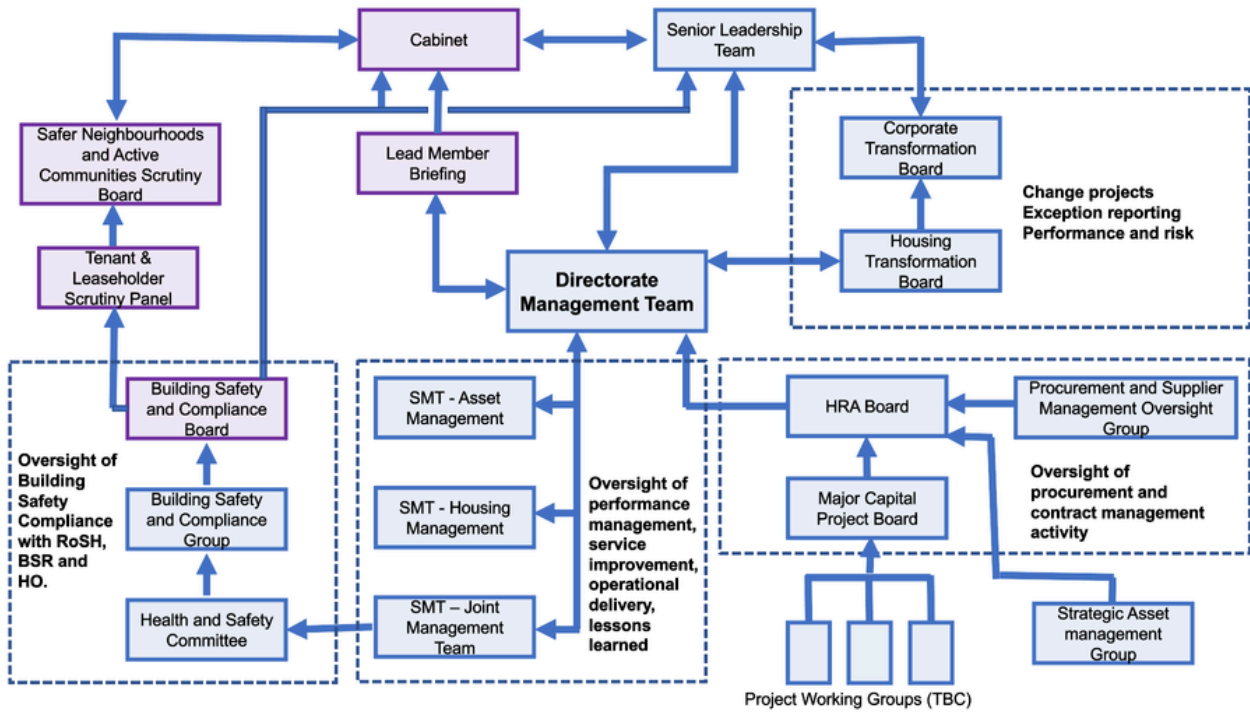
These regulations made it a requirement in law for responsible persons of high-rise blocks of flats to provide information to Fire and Rescue Services to assist them to plan and, if needed, provide an effective operational response.

Also, the regulations require responsible persons in multi-occupied residential buildings which are high-rise buildings, as well as those above 11 metres in height, to provide additional safety measures. In all multi-occupied residential buildings, the regulations require responsible persons to provide residents with fire safety instructions and information on the importance of fire doors. The regulations apply to existing buildings, and requirements for new buildings may be different.

Management and Governance Arrangements



MANAGING THE ASSETS



MANAGING THE ASSETS

Capital Improvement

The Council's historical improvement regime was to invest in improvements on a cyclical estate by estate basis. Moving forward, our plans for improvement will be determined by an evidence base using data to measure how properties are performing in terms of condition and energy efficiency prioritising improvements on a 'worse first' premise.

The plan is to complete 14,000 surveys by the end of 2025 and then complete 100% of all stock by 2026. A five-year rolling programme will be implemented to support the ongoing knowledge of stock condition, with 20% of the stock being reviewed each year.

The initial 5,000 surveys were completed to provide a representative sample of the housing stock including a variety of archetypes across the whole borough, which will help us design future improvement programmes, provide a more robust strategy and support financial forecasting.

Following the completion of the surveys the introduction of the rolling programme will be implemented in a manner to take into consideration the risk association with the stock such as age, construction, reoccurring complaints or repairs which may be indicative of wider issues. The programme will take into consideration all factors including data surrounding repairs and complaints to determine the frequency of the stock condition surveys.

The surveys will help identify the condition of the key components within the dwelling. All components have a pre-determined expected lifecycle when a replacement would be expected. By surveying the component, an assessment can be made as to whether it is failing and due a replacement, or whether there is life remaining. This gives us the evidence base to prioritise the improvement works on a worse first basis.

The key components that we look to install or upgrade on a capital improvement programme are:

- Boilers (or other heating sources)
- Electrical upgrade
- Kitchens
- Bathrooms
- Windows
- Doors
- Roofs
- Soil stacks
- Thermal efficiency measures
- Air Source Heat Pumps (ASHP)
- Fire safety – e.g. smoke, heat and carbon monoxide detectors; sprinklers, etc.

High Rise Blocks

We have invested in 41 of the Council's 52 high rise blocks to improve the thermal comfort and upgrade the communal areas of the block and ensure that the blocks are compliant with building safety.

1 high rise in part of a PFI scheme with Riverside (Harvills Hawthorn) as the managing agent.

Work is in progress on 2 more high-rise blocks. The remaining 12 blocks will be prioritised utilising an evidence base considering the outcome of condition surveys, levels of disrepair and housing management considerations.

The Golden Thread and Building Safety Cases as required by the Building Safety Act are also managed and produced. Resident Engagement Strategies have been produced and distributed to all residents of High Rise Blocks.



Retrofit of Housing Stock

To some extent, the Council has for many years included retrofit considerations when developing planned improvement programmes for the housing stock. In the early days of retrofit this was limited to cavity wall/loft insulation, double-glazed PVCu windows and heating appliances with high-efficient energy ratings (gas boilers/storage heaters). The need to achieve an EPC rating C by 2030 has increased the emphasis on energy-efficiency works and with this in mind we are now expanding the type of measures included. Successful bids under the Social Housing Decarbonisation Fund (SHDF) for example, have enabled us to specify external and internal wall insulation where appropriate as part of refurbishment schemes.

For high-rise flats in particular, the inclusion of external wall insulation as part of major refurbishment schemes has had a very positive impact upon the lives of residents, both in regard to thermal comfort and energy bills.

In 2023 the first air-source heat network scheme was delivered to one of the largest high-rise blocks in Sandwell (including some surrounding low-rise). This should provide a template for future high-rise refurbishment projects and will help to decarbonise the stock, replacing gas boilers and electric storage heaters.

The Council is currently considering development of a major heat network in and around West Bromwich, which could supply heat from a low-carbon source to 12 high-rise council-owned blocks. It could also connect to any future new-build housing developments situated along the designated spine route. The Council are developing the scope and use of Solar photovoltaic panels (PV) as part of the new build commitment, and to support fuel poverty with the use of free, renewable, clean electricity to power our residents' homes.

Net Zero Neighbourhood Planning

Sandwell is engaged in a transformative initiative to create a net zero neighbourhood in partnership with the local community. The project sponsors are the West Midlands Combined Authority and they have asked the regional authorities to deliver demonstrator projects which will be used as a basis for learning and the future delivery of regional retro fits. The ambition is that we enable communities to reduce carbon emissions, improve energy efficiency, and enhance the overall quality of life.

By focusing on a combination of retrofitting, behaviour change, and community engagement, the project seeks to create a sustainable model for other neighbourhoods to follow. Retrofitting efforts will involve conducting energy assessments on individual properties and implementing targeted improvements, such as insulation upgrades and other energy-efficient measures. However, given the constraints of the funding, the project will prioritise the most cost-effective and impactful interventions. We shall continue to explore a mixed model of funding for full delivery and also establish partnerships both within the community and the wider sector to strengthen our regional power.

Recognising the critical role of behaviour change in achieving net zero goals, the project will also implement strategies to encourage residents to adopt more sustainable practices. The fabric first approach will deliver improvement in energy efficiency of buildings making them ready for advanced technologies and renewable energy. However, to foster a sense of ownership and responsibility towards net zero we recognise that it is important that we engage our residents.

Our approach will involve residents in the decision-making process and provide opportunities for input, we aim to create a sense of shared responsibility and investment whilst also identifying and addressing any potential barriers or challenges that may arise during implementation.

Our engagement with our residents will include promoting active travel, reducing energy consumption, and making informed choices about home and neighbourhood management. To facilitate these changes, we will, in collaborate with community organisations, provide education, support, and incentives.

Our net zero neighbourhood project represents a significant step towards a more sustainable future by embracing innovation, fostering partnerships, and empowering residents, the project has the potential to inspire and guide other communities on their journey towards a net zero future.

Aids and Adaptations

Aids and adaptations is a demand led service that will be delivered as a result of Occupational Therapist intervention. Assessments are completed by OT's in line with their good practice guide. Each case will be individually assessed on its own merits and the Council decides what is reasonable in the light of its need to make housing available to a wide range of people in need, over the long term.

The aim of the Adaptations Service is to enable tenants and members of their household with disabilities to be provided with housing which best meets their assessed needs. The council will consider alternatives to adaptations, such as the provision of equipment or if appropriate assistance with relocation, when deciding on the most suitable option(s) to meet a person's needs. Decisions regarding an individual's needs will be made in accordance with the views of the tenant and the council's Guidance for the Provision of Equipment and Adaptations. All other assistance types are discretionary and subject to funding being available.

Each adaptation request will be looked at individually to ensure that the adaptation meets the current needs of the resident and where possible amended so that it will meet their needs in the future, thus saving on further adaptations being carried out at a later date.

Voids

A critical aspect of meeting our obligation to residents is through our performance in re-letting properties, ensuring homes remain vacant for as short a time as possible and completed to the agreed re-let standard.

Properties that have the potential to become long term and high-cost re-lets are assessed to ensure that investment is appropriate, and that the properties will be sustainable following investment, with a positive future net present value.

This approach aims to ensure that a property is properly managed when it becomes vacant, is brought up to the council's 'lettable' standard before a new tenant moves in, and that the rent loss is minimised within the whole process. The 'lettable' standard has been reviewed to improve the standard in which the properties are let to residents. This will include considering the work required to improve the decency and the thermal efficiency of the property, whilst there are no tenants in occupation. Where possible, we will carry out an assessment to understand the work required to ensure a void is EPC C or above before re-let.

The purpose of this Standard is to:

- Set out the principles and service standards of the void management service.
- Help to meet local housing need by maximising availability of social housing.
- Deliver continuous improvement through efficient management of voids, as well as contributing to sustainable tenancies, maximising rental income.

Play Areas

Our green spaces team includes officers and inspectors who ensure our play areas are well maintained and inspected:

- Monthly inspections take place to check all equipment is safe and check any maintenance issues that are needed.
- Routine inspections are completed every three months.
- Annual inspections are completed for each play area by an external organisation.
- All play area inspection reports keep a record of maintenance and improvement actions which are rated on priority. The most urgent issues might require a closure of a piece of equipment until the issue is fixed (i.e. equipment that requires repair), and the lowest level issues (i.e. painting railings) will be completed as soon as we are able, within our budget available.

The introduction of the Green Spaces Strategy 2022 – 2025 approved by Cabinet established a programme of works for that year which involved using a mixture of funding to make improvements to play areas. The focus is on those play areas and green spaces with the lowest quality scores, and to raise Sandwell's overall greenspace quality scores from 34/100 to 50/100 by 2025. The approach adopted to housing assets managed by green spaces will be to include in the annual programme of works that is then approved by Cabinet each year and published online. We are currently bulking up this work to ensure all our play areas and green spaces in housing ownership are fit for purpose.



Land

As a large social landlord, SMBC owns vacant land. There are small areas of land managed by Sandwell's Housing Department that are thought unsuitable for development (other than as part of a more major programme of estate redesign), together with larger areas of land with potential for residential or non-residential use.

The Council's affordable housing strategy will make use of available land assets and will do this in a way that supports plans for local estate regeneration.

All HRA land will be reviewed on a continual basis to ensure best use is considered and holding costs mitigated where feasible.

Tenant Satisfaction Survey

As part of the ongoing commitment to seek the views of tenants, we carry out annual Tenant Satisfaction Surveys using the 'Tenant Satisfaction Measures' (TSM) perception survey questions. The most recent survey carried out in Autumn 2024 has identified that the key driver of overall satisfaction is the quality of home, followed closely by how well the Council listens to residents' views and acts on them. This highlights the need to work with our residents to improve asset management.

There were standout drivers of overall satisfaction that are clearly interrelated:

- the overall repairs and maintenance service provided
- provision of a home which is well maintained
- being easy to deal with.

INVESTMENT PRIORITIES

There are a number of possible scenarios around asset investment with competing priorities. Whilst some investment is essential and non-discretionary (e.g. statutory compliance activity or work to maintain Decent Homes), other investment is more discretionary. Of our more discretionary investment, some will be key to maintaining the income stream (e.g. the re-modelling or redevelopment of hard to let former extra care schemes / sheltered accommodation) whilst others may be more based on improving tenant satisfaction (e.g. environmental improvements on estates). Enhancements to the data enables us to provide Members and tenants with greater assurance that the highest priority requirements are being met and to illustrate the capacity that remains for any improvement related spend.

As a result, this also means working closely with residents to understand their needs and concerns, incorporating their feedback into housing and asset management decisions. Disrepair and updated legislation mean that budgets are more strained than ever. Whilst compliance and minimum standards will need to be adhered to, certain aspects of capital delivery works may need to be changed or scaled back. Those decisions will be agreed with residents and, where possible, expenditure needs careful consideration and risk management to ensure there are no regrets.

Investment Planning

To date the Council has planned investment on a cyclical and estate by estate basis, however, the objective is to develop a longer-term programme of work that can provide stakeholders with greater visibility of work in the medium term. This new strategy will provide a framework to develop a 5-year programme of work to support a targeted package of work which is led by data intelligence. It provides a budget that ensures the investment plan fits within the financial parameters of the business plan.

The stock condition survey results will provide the baseline for the investment planning process. Added to these will be non-survey costs which include: communal area improvements and electrical upgrades, building safety and other compliance costs, estate and external works, door entry systems, and small scale improvements, as well as day to day maintenance (responsive void and cyclical).

Getting the right priorities will require involving a range of staff from across services. To achieve this, a process will be developed to turn the stock condition and other relevant data into a plan that optimises the available budgets and delivers value for money through:



- Alignment to the latest HRA Business Plan in accordance with strategic investment objectives;
- Triangulating repairs data, investment requirements, energy performance, void rent loss and asset performance in order to prioritise the properties will have the greatest impact on reducing revenue costs and income loss;
- Breaking that data down into the planning areas based on locality and stock type;
- Developing efficient programmes – including considering frequency of component replacement combinations and packaging, potentially conflicting programmes (e.g. window replacements against wall insulation programmes) and supply chain preferences;
- Considering the impact on leaseholders and the production of the annual service charge plan resulting from the investment plan.

Disposals

It is appropriate that the Council regularly reviews the assets within its portfolio to ensure they remain fit for purpose and aligned with the Council's corporate priorities and objectives. An options appraisal exercise will be carried out when stock is identified as cause for concern. The options appraisal will assess the feasibility and viability of retention through alternative tenure or redesign or remodelling.

Where it is assessed as being in the best interests of Sandwell Council and its tenants, arrangements may be considered for the disposal of assets. The disposal of properties giving cause for concern will occur in circumstances where either there is no other viable or economic basis for retaining the property, or where after due consideration the property is not considered an asset which will benefit either Sandwell Council or its tenants in the longer term.

This must be done in a structured and controlled manner to ensure that any disposal of assets does not cause longer term operational difficulties or fail to achieve the best return for Sandwell Council – for example, if a property has a poor EPC performance and cannot achieve a minimum rating of band C through improvement work without unfeasible investment costs.

Given the significant financial challenges faced by councils, it is important to ensure that the best outcome is achieved from any disposal, and this will need to consider:

- Holding cost of any surplus assets if to be retained for longer term use or sale
- Running costs for under-utilised assets and how these can be reduced
- Service requirements across the Council to ensure an asset is not being sold off if it could provide a cost-effective solution for another service area
- Loss of revenue from any income producing assets
- Impact on the local area from holding assets empty for prolonged periods or benefit from regeneration
- Reputational issues from having vacant assets.

Value for Money

As part of the New Consumer Standards introduced by the Regulator of Social Housing, registered providers must ensure that the delivery of repairs, maintenance and planned improvements to homes and communal areas is informed by the needs of tenants and provides value for money.

Our asset management approach will aim to deliver value for money, ensuring that as far as reasonably practicable expenditure is targeted to improve both energy efficiency and decency whilst also considering the whole life costs of assets to maximise financial return.

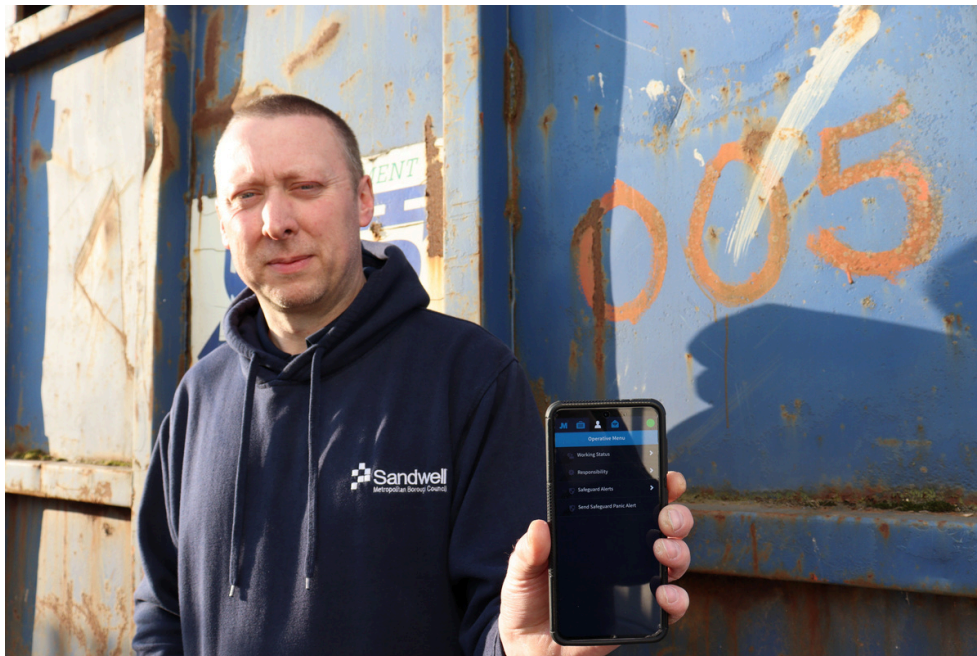
SYSTEMS AND DATA

Transformation and Improvement Plan

Having clear systems and accurate data is important for record keeping, analysis, compliance management and identifying priorities, and to help facilitate effective decision making across the service and council. Our forthcoming Transformation and Improvement Plans will help drive this, supported by good business processes, a comprehensive systems approach will improve communication and collaboration while reducing silo working. The focus of this approach is as follows:

- Rationalisation of all systems and data management across the service with having as few systems as possible, but as many as necessary in order not to compromise functionality
- A focus on integration and automation of processes
- Flexibility to incorporate and capitalise upon emerging technologies
- Improved communication and efficiency of data management
- Improved internal and public visibility of works and other information.

All of this will lead to greater assurance in all our interactions with all stakeholders with regards the management of our assets.



GOVERNANCE AND RISK MANAGEMENT

Risk Management

Risk management is a key factor for the Council in the way it delivers activity in its property in part due to the Council wishing to deliver its statutory responsibility but then also to deliver a quality environment for its employees and residents.

The strategy recognises that Housing Revenue Account (HRA) assets can also become liabilities, creating a risk to viability as well as significantly impacting on residents' lives. Key risks addressed by this strategy include:

- Failures to manage health and safety compliance could put residents, staff and contractors at risk.
- Failures to meet statutory or regulatory standards can carry penalties and will damage the Council's reputation.
- Failure to maintain the golden thread between the understanding of stock condition and investment need and the allowances within the Business Plan.
- An incorrect scope or poor quality of stock investment will have a key influence on customer satisfaction.
- Poor value for money in stock investment will have a major impact on our finances as this represents a very large proportion of our HRA spend.
- Internal and external factors impact on investment need and expenditure. Key amongst these are currently fire/Building Safety and energy efficiency. We will need to remain aware of the impact of these on investment levels in existing stock and any subsequent impact on our investment plans.
- Internally published standards will need to be reviewed – changing standards may carry reputational risk.

A process to identify and assess risks is in place and actions agreed to manage risks to minimise impact. All key asset management related risks including financial, operational, delivery risks (e.g., failure to invest) are captured in the appropriate operational risk register.

Where appropriate funding to deal with risk is applied for with appropriate time horizons so risk can be managed within the Council's strategy.

Insurance

The Council takes its responsibilities towards the land and property assets in its control seriously. The Council's prudent and sensible approach to risk is an important factor for Insurers when considering the risk that they are willing to insure.

The Council has a number of decisions to take when considering insurance on its property assets. The specific details of the Council's insurance are commercially sensitive however it does actively consider factors such as affordability, excess and other factors. Therefore, having a prudent approach to risk management is a key factor in allowing the Council to access the insurance market at an affordable level, whilst also maintaining the level of insurance that is expected of it.

Three Lines of Defence

Sandwell Council needs to ensure our risk management framework provides full assurance of compliance with the Regulator's Consumer Standards. As part of this, we implement the 'three lines of defence' framework to evaluate, develop and strengthen our overall approach:

- First line: How day-to-day risks are controlled by those responsible for delivering activity. This requires a suitable operational delivery model and clearly defined roles and responsibilities, with policies and procedures being key controls.
- Second line: How teams check the control framework for delivering activity is operating effectively. Management and Leadership Team oversight and assurance-based performance reporting are some key controls. Clear strategies and objectives will provide the support for this to be achieved.
- Third line: Objective and independent checks to confirm that activity is operationally aligned with policies, processes and procedures, legislation, accrediting bodies, and best practice. Internal audit and external, independent audits are key controls.

ACTION PLANNING

A detailed action plan has been developed identifying the specific actions required, who is responsible, and timeframes involved which will be monitored to evidence impact the action plan. The action plan template can be found in **Appendix One**.

Governance

To make sure that we can deliver our priorities, the action plan will be published alongside the finalised strategy and will be reviewed regularly. We will use key data and other information to tell us what is happening, and review and update our actions accordingly.

Reports will be made to the Tenant & Leaseholder Scrutiny Group and will report regularly to Leadership Team, the Cabinet Member for Housing and Safer Neighbourhoods and Active Communities (SNAC) Scrutiny Board.

APPENDICES

Appendix One

Action	Short, medium, or long term	Lead