

	Audit and Standards Advisory Committee 23 September 2026
	Report from the Corporate Director of Residents and Housing Services Lead Member – Cabinet Member for Housing, Homelessness and Renters (Councillor Robert Johnson)
Update on the Response to Housing regulator findings and Brent graded at C3 (Safety and Quality Standard).	
Wards Affected:	All
Key or Non-Key Decision:	Not Applicable
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Spencer Randolph - Director of Housing Services Tel: 020 8937 2546 Email: Spencer.randolph@brent.gov.uk Gary Mitchell - Head of Housing Management Service Tel: 020 8937 2956 Email: Gary.Mitchell@brent.gov.uk

1.0 Executive Summary

- 1.1 This report provides the Audit and Standards Advisory Committee with the latest update on the Council's response to the C3 regulatory judgement issued following its self-referral to the Regulator of Social Housing in April 2025. Material improvements include the full rebuild of True Compliance; correction of approximately 3,000 certificate issues; removal of inaccurate property records and addition of missing blocks and sub-blocks; validation of the social housing asset base; closure of more than 5,200 fire risk assessment actions since July 2025; stronger governance and specialist accountability; and stock

condition survey coverage reaching 72%, with full coverage targeted by April 2027.

- 1.2 Despite this progress, the Council remains graded C3 and cannot yet demonstrate sustained compliance across all safety and quality requirements. The principal areas of non-compliance or high residual risk are the remaining overdue and legacy fire safety actions; completion and evidencing of Building Safety Cases and external wall assessments; delivery of outstanding compliance contract procurements; completion of system integration; independent assurance over rebuilt data; reliance on interim or agency specialist capacity; and completion of surveys for the remaining 28% of homes.
- 1.3 The Committee should pay particular attention to whether risk reduction is keeping pace with the recovery trajectory; whether closed actions are supported by complete and auditable evidence; whether procurement delays, system dependencies and workforce capacity threaten key milestones; and whether independent assurance confirms that reported compliance performance is accurate and embedded in operational practice.

2.0 Recommendation(s)

- 2.1 That the Committee note the progress made in strengthening the Council's building safety and compliance arrangements, while recognising that the programme remains in recovery and that further work is required to evidence sustained compliance and support a future review of the C3 grading.
- 2.2 That the Committee notes the progress made, identifies any areas requiring further assurance, and current compliance performance, high-risk actions and the outcome of independent assurance work.
- 2.3 That the Committee note the remaining priorities, including completion of legacy fire safety remedial actions, delivery of Building Safety Cases and external wall assessments, implementation of new compliance contracts, completion of systems integration, independent assurance of the rebuilt data and achievement of 100% stock condition survey coverage by April 2027.

3.0 Detail

Contribution to Borough Plan Priorities & Strategic Context

- 3.1 The work detailed in this report and that of the Housing Management Service more generally supports the Council's wider borough plan to Move Brent Forward Together. In particular, the work presented with this report supports the borough plan priority to provide prosperity and stability in Brent through helping to deliver the desired outcome for safe, secure and decent housing across the borough.

Background

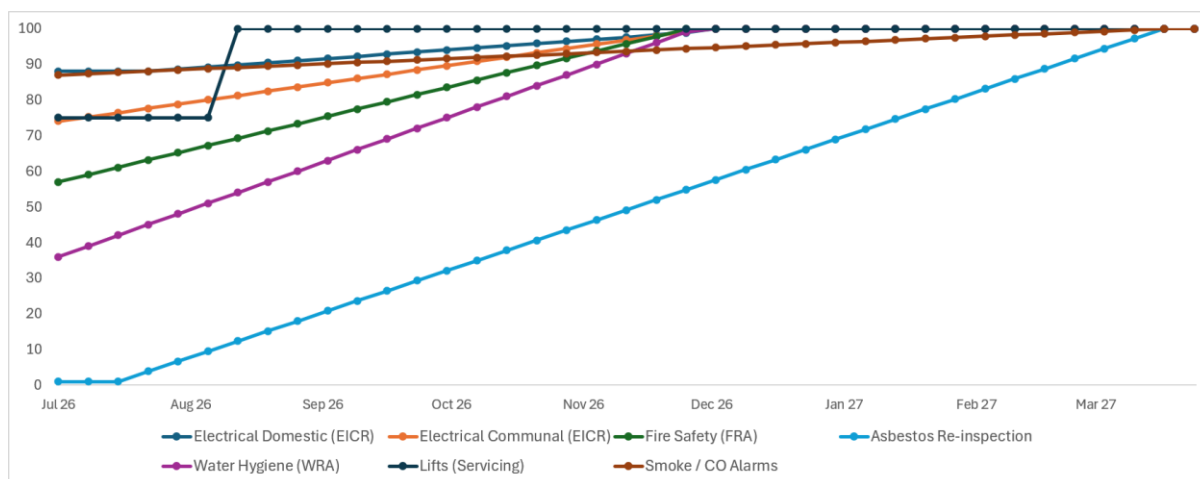
- 3.2 In April 2025, it was identified within the Housing Management Service that 'True Compliance', the software utilised by the service to manage and monitor building safety compliance, had been updated incorrectly. Further investigations established that up to 12,500 fire actions had been wrongly updated to indicate that works had been completed but were missing the required supporting evidence. In addition, the council was unable to reconcile performance data on asbestos management, water safety and detectors for smoke and carbon monoxide. Issues relating to data available regarding stock condition were also identified.
- 3.3 In recognition of the seriousness of the issues identified and in line with the requirements of the Social Housing (Regulations) Act 2023 around transparency, the service self-referred to the Regulator of Social Housing. Following this self-referral and subsequent information provided to the Regulator as part of their investigation, on the 28th May 2025, the Regulator [published its regulatory judgement](#), grading us at **C3**, confirming that serious failings had been identified and significant improvements were needed.
- 3.4 In response to the situation, the council appointed Caldistons, a health and safety advisor that specialises in building safety and assisting landlords in meeting the requirements and outcomes set out in the Social Housing (Regulations) Act 2023, in particular The Quality and Safety Standard.
- 3.5 Caldiston Ltd carried out an independent forensic audit across all key compliance workstreams (including fire, gas, electrical, water, asbestos and decent homes requirements) which was completed in August 2025. The audit involved desktop reviews, staff interviews and validation of data from multiple systems in use by the service, including True Compliance, NEC, and LifeSpan.
- 3.6 The findings from the audit highlighted and clarified several areas that the service had already identified as needing focus, as well as some additional key learning. These findings fed into the development of a robust action plan for improvement. This action plan also included root cause analysis (as recommended by The Regulator), to ensure permanent solutions are in place to prevent similar issues arising in the future and continues to form a key part of the agenda and monitoring for the relevant project board under the Housing and Tenant Improvement Programme.

4.0 Current position and ongoing improvement work

- 4.1 The recovery programme is now moving from identifying weaknesses and correcting historic records into sustained delivery. Governance is established through weekly project oversight, monthly reporting to the Building Safety Compliance Project Board and escalation through the Housing and Tenant Satisfaction Improvement Programme and Corporate Management Team. Progress reports and supporting evidence continue to be shared openly with the Regulator of Social Housing.

- 4.2 The Council continues to maintain constructive engagement with the Regulator. As the recovery programme has matured, formal meetings have moved from monthly to every two months, supported by written reporting and evidence between meetings. This reflects a more established reporting cycle, but does not reduce the Council's commitment to transparency, timely escalation or delivery of the improvement plan.
- 4.3 True Compliance has been fully rebuilt and is now the primary source for property compliance reporting. The rebuild has established a new asset hierarchy and corrected approximately 3,000 certificate issues. It has also removed 263 duplicate, sold or demolished property records, added 364 previously missing blocks and created 270 missing sub-blocks. Compliance streams and Council-owned social housing stock have been reviewed and validated, providing a substantially more accurate and evidenced representation of the Council's current compliance position.
- 4.4 The improvement in data quality means that performance is now reported on a more credible basis. This has made some compliance gaps more visible than under previous reporting, but it gives the Council a reliable baseline from which to manage risk, track contractor delivery and demonstrate measurable improvement. An independent assurance audit of the rebuilt True Compliance data is planned to provide further confidence before it is relied upon for future regulatory submissions.
- 4.5 Work on NEC Housing continues. The core property data has been extensively cleansed, including correction of ownership, address, Local Land and Property Gazetteer and management responsibility information. The programme is now focused on significant operational and functional improvements, including improved repairs and income functionality, clearer asset control processes, new reporting capability and interfaces between NEC, True Compliance and other housing systems. Although the programme has experienced delay, additional specialist resources are in place and the remaining dependencies are being actively managed through programme governance.
- 4.6 The Council has reprocured the company delivering stock condition surveys and is working to bring the programme forward by a year. The target is now to complete surveys for 100% of the housing stock by April 2027. We are currently sitting at 72%. Each property will be individually surveyed rather than relying on cloned assumptions, and the resulting information will be reconciled with the validated asset base to improve Decent Homes reporting, investment planning and identification of health and safety hazards.
- 4.7 Fire safety recovery remains a central priority. More than 5,200 fire risk assessment actions have been closed since July 2025, while the remaining overdue actions are being managed through a risk-based recovery trajectory with specialist resources and monthly reporting. The Council is also progressing Building Safety Cases for its higher-risk buildings and completion of the outstanding Fire Risk Assessments of External Walls, with delivery aligned to the March 2027 programme milestone.

- 4.8 Compliance policies and assurance arrangements have also been strengthened. A new suite of policies and management plans have been written and are being introduced, including approved arrangements for damp and mould, and the Quality Assurance function is undertaking targeted reviews to test whether documented requirements are consistently followed in operational practice. A live compliance dashboard is being developed to improve visibility, strengthen contractor challenge and support routine reporting to senior management and governance boards.
- 4.9 The compliance team has been strengthened through recruitment to specialist management and contract roles. Retaining competent building safety and compliance staff remains a sector-wide challenge, and interim or agency resource will continue to be used where necessary. New procurement activity is progressing so that each compliance workstream has a suitable contract and capable contractor in place, supported by clearer performance measures and stronger contract management.
- 4.10 New posts have been introduced with specialisms in compliance streams rather than generic management giving more accountability
- 4.11 The recovery action plan continues to be reviewed frequently and incorporates the findings of the independent audit and root cause analysis. Further priorities include verifying the historic fire actions against evidence, completing remedial works, embedding a contractor performance framework, improving workforce resilience and compiling a robust evidence pack to support a future request for review of the Council's regulatory grading.
- 4.12 The direction of travel is positive, and the Council now has stronger governance, clearer accountability and materially improved data. However, the programme remains high risk until the remaining compliance backlogs, system interfaces, procurement dependencies, cladding and Building Safety Case requirements are completed and sustained operational performance can be evidenced over time.
- 4.13 The Council's immediate objective is to convert the stronger controls, systems and assurance now in place into consistent outcomes for residents. Success will be evidenced through reduced overdue actions, complete and auditable safety records, improved contractor performance, completion of stock surveys, reliable real-time reporting and clear assurance that compliance is embedded as business as usual.
- 4.14 A Recovery plan has been developed and implemented to address the operational compliance position on a number of streams. The forecasted plan is set out below with a target of 100%, with exception of asbestos, by the end of the calendar year. Improvements are monitored in weekly operational meetings with contractors



5.0 Financial Considerations

- 5.1 Like other local authorities, Brent is facing significant financial pressures and is continuously needing to look for efficiencies to address budget challenges. Some of the main challenges that could affect the long-term viability of the HRA Business Plan along with rent levels are major works and repairs.
- 5.2 As the Council adds more stock to its portfolio and complexities of new additional requirements to building standards are increasing, such as fire safety works and decarbonisation, the cost of major works are rising. At the moment, there is insufficient government subsidy available to address these changes. The Asset Management Strategy and investment plans must be approached cautiously and allow for flexibility to scale back on schemes where required. Careful budget monitoring and financial planning are crucial.

6.0 Legal Considerations

- 6.1 This report ensures compliance with the regulatory standards for housing, in particular ensuring we comply with the requirements of the Social Housing (Regulations) Act 2023 (the "Act").
- 6.2 The Act received royal assent on 20 July 2023. It makes provision for the regulation of social housing landlords, particularly with regard to issues such as safety, transparency, standards and conduct of staff and tenant engagement. The Act also strengthens the powers of the Housing Ombudsman and enables requirements to be set for social landlords to address hazards such as damp and mould within a fixed time period.
- 6.3 As a result of the amendments made by this Act, safety and transparency will become explicit parts of the objectives of the Regulator of Social Housing ("the Regulator") and the Regulator will have greater powers in relation to the competency and conduct of staff and the provision of information. The Regulator will also be given strengthened economic powers to ensure they can effectively intervene when required to enable them to assess landlords failing to meet standards more routinely and proactively, as well as taking action in a wider range of circumstances. Changes are also made to the economic

regulatory regime to ensure that providers of social housing are well governed and financially viable.

- The Act has three core objectives as follows:
- To facilitate a new, proactive consumer regulation regime
- To refine the existing economic regulatory regime
- To strengthen the Regulator's powers to enforce the consumer and economic regimes.

6.4 On 29 February the Regulator set out the revised consumer standards that apply to all registered housing providers from 1 April 2024. The new standards are:

- The Safety and Quality Standard
- The Transparency, Influence and Accountability Standard
- The Neighbourhood and Community Standard
- The Tenancy Standard

6.5 The introduction of the revised consumer standards also included information on the Regulator's Tenant Satisfaction Measures (TSM) referred to above, that all social housing landlords must report on. The TSMs will help the Council to see how well it is doing in areas such as keeping properties in good repair, maintaining building safety, and effectively handling tenant complaints. The Regulator required all landlords who own more than 1,000 homes to submit their first TSM data return by 30th June 2024 to enable the Regulator to publish the first year of data by autumn 2024.

6.6 As a social landlord the council has a duty to provide a safe environment for those living in their homes. Failure to comply could result in negative outcomes ranging from customer dissatisfaction and criticism to a requirement to submit (to the Regulator) a Performance Improvement Plan, or to take particular remedial actions as set out in an enforcement notice. If necessary, the Regulator will be able to authorise an appropriate person to enter a social housing premises to take emergency remedial action, issue penalties such as unlimited fines, or require the provider of social housing to pay compensation. A provider of social housing will commit an offence if they obstruct access or work required to undertake remedial action. A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 4 on the standard scale.

6.7 As per the report the council completed a self-referral that focused on the Safety and Quality Standard. The regulator notes that: "This is the first time we have issued a consumer grade in relation to this landlord. LB Brent has engaged positively with us since making its self-referral and has plans in place to understand the wider impact of its current position. Those actions include work to understand the root causes of the presenting issues, reviewing the completion of all closed fire safety remedial actions through a risk-based approach and working to develop a suitable action plan to resolve the issues. We will continue to engage with LB Brent as it seeks to address the issues that have led to this judgement. This includes evidencing that it is taking reasonable

steps to mitigate risks to tenants as it creates and delivers its improvement plan. We are not proposing to use our enforcement powers at this stage but will keep this under review as LB Brent seeks to resolve these issues”.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The public sector equality duty set out in Section 149 of the Equality Act 2010 requires the council, when exercising its functions, to have due regard to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not share that protected characteristic. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

8.0 Climate Change and Environmental Considerations

- 8.1 Housing is a key stakeholder in delivering the Councils Climate Action strategy. The actions Housing is responsible for are as follows:

- Retrofit work to three tower blocks;
- We will deliver further retrofitting projects via the Council's Carbon offset fund;
- We will develop and implement employer requirements for energy efficiency standards within all new Council housing;
- We will explore and identify an opportunity for an exemplar net zero new build within the NCHP;
- We will review developments within our NCHP pipeline to ensure that all aspects of sustainability are holistically addressed, with a special focus on the proposed development plans for St Raphael's Estate.

9.0 Human Resources/Property Considerations (if appropriate)

- 9.1 At this time it is anticipated that additional resource will be required in the short to medium term, to assist with the recovery programme.

10.0 Communication Considerations

- 10.1 The Council is taking a proactive and coordinated approach to engagement with tenants, leaseholders, elected members and the wider community. A dedicated Housing Communications Officer has been appointed and is ring-fenced to support the Housing and Tenant Satisfaction Improvement Programme. The officer works with Corporate Communications and Resident Engagement to maintain the communications plan, produce and distribute key housing information, improve service-led communications and ensure activity is informed by resident feedback and measures of impact.

- 10.2 Effective communication and engagement with residents and key stakeholders remain central to the recovery plan. The Council has appointed a dedicated Housing Communications Officer, to support the Housing and Tenant Satisfaction Improvement Programme and strengthen communications with tenants and leaseholders. Working closely with the Corporate Communications and Resident Engagement teams, the officer is responsible for delivering clear, consistent and accessible information, maintaining the housing communications plan, supporting two-way engagement and measuring the impact of communications activity so that learning can be used to improve future engagement.
- 10.3 The dedicated officer is leading and coordinating the Council's flagship housing communications, including The Noticeboard, e-newsletters, the annual report to tenants and leaseholders, website content, resident letters, frequently asked questions and multimedia updates. The role also supports Housing teams to improve the quality and consistency of service-led communications through templates, advice, coaching and proportionate quality assurance.
- 10.4 A suite of new building safety compliance policies has been developed, and residents were given the opportunity to comment on draft versions of these. Resident feedback particularly highlighted the technical nature of the policies and so, in response to that feedback, an over-arching resident guide to building safety has been created to improve accessibility.
- 10.5 A programme of annual building safety meetings continues across all our high-risk blocks. Whilst attendance has been low at several of these, the meetings have been well received by residents who have attended. Letters are also sent out to all residents of each block with the key information shared following the meetings.
- 10.6 The officer leads and coordinates flagship products including The Noticeboard, e-newsletters, the annual report to tenants and leaseholders, website and frequently asked question updates, resident letters and multimedia content. Communications are supported by dedicated building safety contact routes and WhatsApp channels, while face-to-face engagement continues through high-rise building safety meetings, summer roadshows, tenant and leaseholder events, Resident Association Chair seminars and resident scrutiny forums. Feedback from these activities is captured and used to shape future communications and service improvement.

Report sign off:

Thomas Cattermole

Corporate Director of Residents and Housing Services