

To: Council
Date: 13 July 2026
Report of: Director of Housing
Title of Report: HRA Property Services Policies

Summary and recommendations	
Decision being taken:	To approve the following policies: aids and adaptations, complaints, compliance, decant, disposals, gas safety, health and safety, lifting equipment and lifting operations, mutual exchange, no access, permit to work, radon and voids to ensure the maintenance and good management of the housing stock.
Key decision:	No
Cabinet Member:	Councillor Linda Smith – Housing and Communities
Corporate Priority:	Good, affordable homes
Policy Framework:	HRA Asset Management Strategy

Recommendation(s): That Council resolves to:	
1.	Approve the Aids and Adaptations Policy
2.	Approve the Complaints Policy
3.	Approve the Compliance Policy
4.	Approve the Decant Policy
5.	Approve the Disposals Policy
6.	Approve the Gas Safety Policy
7.	Approve the Health and Safety Policy
8.	Approve the Lifting Equipment and Lifting Operations Policy
9.	Approve the Mutual Exchange Policy
10	Approve the No Access Policy
11	Approve the Permit to Work Policy
12	Approve the Radon Policy
13	Approve the Voids Policy

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Aids and Adaptations Policy	No
Appendix 2	Complaints Policy	No
Appendix 3	Compliance Policy	No
Appendix 4	Decant Policy	No
Appendix 5	Disposals Policy	No
Appendix 6	Gas Safety Policy	No
Appendix 7	HRA Health and Safety Policy	No
Appendix 8	Lifting Equipment and Lifting Operations Policy	No
Appendix 9	Mutual Exchange Policy	No
Appendix 10	No Access Policy	No
Appendix 11	Permit to Work Policy	No
Appendix 12	Radon Policy	No
Appendix 13	Voids Policy	No
Appendix 14	Equalities Impact Assessment - Aids and Adaptations Policy	No
Appendix 15	Equalities Impact Assessment – Complaints Policy	No
Appendix 16	Equalities Impact Assessment - Lifting Equipment and Lifting Operations Policy	No
Appendix 17	Equalities Impact Assessment - Mutual Exchange Policy	No
Appendix 18	Equalities Impact Assessment - Decant, Disposal	No
Appendix 19	Equalities Impact Assessment – Voids Policy	No
Appendix 20	Risk Assessment – Complaints, Lifting Equipment and Lifting Operations, Voids policies	No
Appendix 21	Risk Assessment – Decant Policy	No
Appendix 22	Risk Assessment – Disposal Policy	No

Introduction and background

1. Further to the decision of the Cabinet to approve the Housing Revenue Account (HRA) policies in respect of aids and adaptations, complaints, compliance, decant, disposals, gas safety, health and safety, lifting equipment and lifting operations, mutual exchange, no access, permit to work, radon, voids the full Council is asked to approve this suite of policies.
2. Making sure residents have a safe, affordable and decent place to call home is the core purpose of this work. Successive Governments has been working to strengthen the voice of residents and introduce legislation to ensure the good quality of all homes.
3. In 2018, the then Government published the Social Housing White Paper to ensure residents of social housing are safe, listened to, live in good quality homes and have access to help when things go wrong. Consequently, the Social Housing Regulation Act ("the Act") received Royal Assent in July 2023. The Act forms a new regulatory framework for the social housing sector, aiming to give residents greater powers and improve access to quick and fair solutions to problems.
4. The Act aims to ensure Registered Social Landlords (RSLs) are compliant with the consumer standards by giving the Regulator of Social Housing new powers to address RSLs who are not meeting their commitments to residents.
5. The Social Housing Charter detailed what social housing residents should expect from their landlords, including feeling safe in their homes, knowing how their landlords are performing and having their complaints solved quickly.
6. The Act sets out to deliver against each of these commitments:
 - Residents to be safe in their home.
 - Residents to know how their landlord is performing.
 - Residents to have their complaints dealt with promptly.
 - Residents to be treated with respect.
 - Residents to have their voice heard by their landlord.
 - Residents to have a good quality home and neighbourhood to live in.
7. Technical policies are therefore required to adhere to this regulatory regime. They are also key to ensure the effective operation of the Housing Revenue Account (HRA) property service as it ensures that asset management services and the development of the social housing programme are set within a sound operating framework such as meeting key performance criteria, as well as ensuring sustainability objectives are met and monitored.
8. The ability to refresh policies ensures key KPIs can be refined to meet the contemporary needs of tenants and of the wider city in respect of the role of housing in attaining economic growth.
9. At the same time, the need to ensure high standards are maintained can be attained by clear technical policies which ensures consistent follow through with operational work in addressing health and safety objectives.
10. The Council recognises its compliance responsibilities as well as the critical need to listen and act on the lived in experiences of our residents. There has been a series of meetings with the Residents Policy Review Group and surveys with groups of residents which has amended and approved the policies. The Cabinet subsequently approved the policies which are being presented to full Council for approval with this report.

11. There is a need for a suite of other policies to be considered and approved by full Council to meet these regulatory standards. It is envisaged that further policies, once they are considered by residents, will be presented to the Cabinet and full Council for approval.

Aids and Adaptations Policy

12. The aims of the policy are to ensure that wherever possible, the Council assists residents, to remain in their own homes and communities through the provision of aids and adaptations, ensuring that disabled people of all ages can build and sustain their independence.
13. The purpose of any installation of an aid or adaptation is to modify the home environment to restore or enable independent living, privacy, confidence and dignity for individuals and their families. In addition, the policy ensures residents applying for aids and adaptations are treated in a fair and equitable way.
14. The Council is asked to approve the Aids and Adaptations Policy.

Complaints Policy

15. This policy sets out the Council's approach to delivering an effective complaint handling service that meets both the regulatory requirements set out in the Regulator of Social Housing's Transparency, Influence and Accountability Standard and the Housing Ombudsman's Complaint Handling Code 2024.
16. This policy aims to:
- Provide residents with a clear, accessible and efficient complaints process.
 - Ensure residents understand how to make a complaint and their right to access the Housing Ombudsman Service.
 - Ensure complaints are investigated fairly, consistently and impartially.
 - Promote a positive culture of learning from complaints to improve landlord services provided by or on the behalf of the Council.
 - Ensure compliance with all relevant legislation and regulatory requirements.
17. The Social Housing (Regulation) Act 2023 empowered the Housing Ombudsman to issue a code of practice about the complaints procedures that social housing providers should follow.
18. The policy stipulates a two-stage process where complaints are assessed and considered impartially in the interests of providing a good service to all residents.
19. The Council will look beyond the circumstances of individual complaints and consider whether service improvements can be made as a result of any learning from complaints. Using the complaint process in this way enables the Council to learn from the issues that arise for customers and to take steps to improve the services it provides.
20. The drafting of this policy has been undertaken in partnership with the Housing Ombudsman Service who have provided detailed guidance which has led to this draft policy being tabled to the Cabinet for consideration.
21. The Council is asked to approve the Complaints Policy.

Compliance Policy

22. The Compliance Policy details how the Council will meet the legal obligations it has as a landlord and as an employer in relation to HRA properties. This is critical in enabling the Council to deliver on its strategic goals and to provide quality and safe homes for residents. The specific compliance themes and the requirements associated with them range from 'threat to life' responsibilities, such as gas safety and fire safety, through to administrative technicalities set out in various regulations.
23. As a registered social landlord, freeholder and employer, the Councils operate in a defined regulatory environment whereby the effect of any non-conformance with regulatory requirements can be amplified through the impact on our relationship with the Regulator for Social Housing (RSH), and notably their assessment the Council's governance arrangements and performance in meeting the Decent Homes Standard.
24. The Council also has important working relationships with Oxfordshire Fire & Rescue Service as well as national regulators such as the Health & Safety Executive, the Building Safety Regulator, and the Environment Agency. Therefore, the policy provides an overarching framework for core compliance requirements to be met:
25. The Council is asked to approve the Compliance Policy.

Decant

26. This policy concerns the appropriate way to support tenants to move out of properties where emergency repairs are being undertaken. The Council aims to maintain and improve its homes to a high standard and to develop high quality housing.
27. As a result, the Council sometimes need to move tenants out of their principal homes so that major repairs or improvements can take place. We refer to this as a 'decant'.
28. A decant is where a resident moves from their current home to another one, either temporarily or permanently. There is a need to consider suitable alternative accommodation further to Schedule 2, Part IV, Housing Act 1985 and s.20 and s.149 of the Equality Act 2010. In addition, this policy is in accordance with the Ombudsman Order relating to decants.
29. Improvement works and major repairs will normally be carried out whilst the tenant remains in their home. However, there will be certain situations, such as those when the health and safety of the tenant would be at risk or the works are extensive, when works cannot be carried out with the tenant in the property.
30. Where this is the case, the Council will arrange to move the tenant and their household. This will either be done on a temporary or permanent basis, depending on the nature of the works and the tenant will be given this option.
31. The Council is asked to approve the Decant Policy.

Disposals Policy

32. The policy outlines the approach of the Council to the appraisal and potential disposal of HRA assets that are no longer meeting the needs of the Housing Service and where the capital receipt generated could be better utilised elsewhere to support the objectives of the HRA Business Plan.

33. This policy ensures that HRA property and asset decisions are transparent. The policy sets out the criteria to decide how assets will be appraised and outlines a procedure to consider when potentially disposing of HRA assets.
34. This policy is designed to ensure any disposals fit within defined criteria which goes beyond financial management to also ensure social and environmental objectives are considered before a disposal is considered. A series of detailed questions must be addressed in the affirmative before a disposal is agreed to.
35. This policy is in line with best practice across social housing and supports the principle of value for money by avoiding disproportionate financial impact from a small number of low performing assets. This policy applies to the appraisal and potential disposal of HRA land or void housing assets deemed financially unviable or otherwise surplus to the requirements of the HRA
36. This policy does not cover HRA properties sold under the right to buy (RTB) scheme. The RTB scheme has its own process, as set out in legislation.
37. The Council is asked to approve the Disposals Policy.

Gas Safety Policy

38. This policy aims to ensure the safety of our tenants and leaseholders and that gas appliances, fittings, and flues provided for tenants are safe. Gas servicing and Safety covers the provision of cyclical servicing, safety checks and related responsive maintenance to all HRA properties owned or managed by Oxford City Council where gas installation is present.
39. The Council recognises that, as a landlord, it has legal responsibilities to ensure the safety of gas pipework, appliances, fittings, and flues installed for residents' use. The Council would be at risk of potential criminal liability for the organisation and individual officers if systems fail. Recent prosecutions of social landlords demonstrate the Health and Safety Executive's willingness to prosecute for gas safety failures.
40. It is also a key component of Oxford City Council's overall Asset Management Strategy, ensuring that the useful life of individual heating system components is maximised and hence value for money is optimised.
41. The Council is asked to approve the Gas Safety Policy.

Health and Safety Policy

42. The Council recognises and accepts its responsibility to provide and maintain the safest and healthiest work conditions which meet best practice and achieve legal compliance so far as is reasonably practicable.
43. To this end the Health and Safety Policy would:
- To provide all reasonable facilities to mitigate the effects of accidents and impairments to health and safety when they do occur.
 - To disseminate information on safe working relating to specific areas of work and on general safety and health matters relating to all employees.
 - To provide proper and adequate training facilities in order to ensure that all employees are fully instructed in the safe working methods applicable to their jobs.

- To aim for continual improvement of health and safety performance through employee involvement and by the adoption of safety and health measures.

44. The Council is asked to approve the Health and Safety Policy.

Lifting Equipment and Lifting Operations Policy

45. The Council is responsible for maintaining passenger lifts and for carrying out examinations and inspections to ensure those lifts operate safely. In addition to lifts, the Council has a responsibility to maintain stair lifts and hoists to ensure the safety of their tenants in their homes.

46. The Council must establish a policy which meets the requirements of the Health and Safety at Work Act 1974. In addition to this, the policy must provide assurance that measures are in place to ensure compliance with the Lifting Operation and Lifting Equipment Regulations 1998 (LOLER) and to identify, manage and/or mitigate risks associated with relevant lifting equipment.

47. The Council will endeavour to ensure that all lifts and lifting equipment in properties it owns and manages will be in full working order at all times. Where the Council becomes aware that lifts or lifting equipment are not operating as they should, emergency repairs orders will be issued to remedy faults as quickly as possible within the timescales as stated within the policy.

48. The Council is asked to approve the Lifting Equipment and Lifting Operations Policy.

Mutual Exchange Policy

49. The policy sets out the Council's commitment to providing tenants with a good customer experience by giving good advice, managing, and supporting the Mutual Exchange process.

50. The aim of this Policy is to deliver the Council's Mutual Exchange scheme in line with legislation and the relevant guidelines, and to apply the conditions for Mutual Exchanges fairly, consistently and within the statutory timeframe.

51. A mutual exchange is a process which allows Council tenants to swap homes and tenancies with tenants of other social housing landlords. This process can occur with more than two households in a chain of swaps. The exchange can only take place with the written permission from each respective landlord.

52. Mutual Exchange partners assign tenancies and move into each other's properties 'as seen' and take on all the rights and responsibilities set out in the tenancy agreement for the property they move into.

53. The Council is asked to approve the Mutual Exchange Policy.

No Access Policy

54. This policy concerns the Council's approach when tenants refuse access for essential maintenance work to be undertaken.

55. Potential risks resulting from refusals / no access for improvement work include the following:

- Effective delivery of the capital programme and related workstreams, such as significant underspends in the year.
- Value for money – one-off replacements usually cost more, plus may have a longer lead in time compared to a planned approach.
- Health & safety – some elements of work are required from a health and safety perspective
- Safeguarding concerns – The need for these concerns to be identified.

56. Tenancy agreements state that tenants must allow access to inspect and carry out repairs and improvements, and that if a tenant does not allow access that we could take legal action, with the tenant having to potentially pay the costs. When a tenant refuses work or allow access, they are effectively breaching their contract.

57. The Council is asked to approve the No Access Policy.

Permit to Work Policy

58. A permit to work is a formal documented procedure that authorises designated individuals, such as contractors, to carry out specific activities that pose a significant risk within a specified time frame. It is a key part of the procedures required to ensure safety compliance standards are met at all times.

59. The permit to work requires declarations from the people authorising the work and carrying out the work. Where necessary it also requires a declaration from those involved in shift / team handover procedures or extensions to the work.

60. A permit to work should ensure that:

- Everyone involved is fully aware of the hazards involved with the work activity. It is essential that the Permit Authoriser has sufficient technical knowledge of all the processes to be used, and is competent to make judgements about the safety of proceeding with the work
- The location and boundaries of work are identified, where necessary, services are isolated or made physically safe and any other specific hazards are identified and made safe where possible or suitable controls put in place
- The person(s) in charge both of the area and the operation are identified, and that all the necessary signage is displayed in and around the area
- Any monitoring or sampling required before, during and after the operation is identified.

61. The policy details the technical steps that must be followed for the permit to work system to be operational.

62. The Council is asked to approve the Permit to Work Policy.

Radon Policy

63. Radon is a natural, colourless and odourless gas. It is formed by the radioactive decay of small amounts of uranium that naturally occur in all rocks and soils. If left unmanaged this radioactive gas can build-up inside properties causing a potential risk to health by damaging lung tissue, and over a long period may cause lung cancer.

64. Radon levels vary due to an area's geology and day to day building use. The aim of this policy is to provide a radon testing and mitigation programme to identify and reduce the risk in line with prescribed target levels.
65. The Government's UK Radon Map ([UKradon - UK maps of radon](#)) shows that the risk of radon is very limited with low levels of radon having been recorded in east Oxford.
66. As a precautionary policy and to abide by regulatory requirements, this policy will institute the following steps to monitor radon levels:
- Review radon maps and housing stock data to identify properties requiring testing based on location, age, construction type and footprint.
 - Develop a dynamic multi-year testing plan informed by property risk profiling and previous screening results.
 - Deploy passive radon detectors in designated homes according to best practice for optimal placement and duration.
67. The Council is asked to approve the Radon policy.

Voids Policy

68. This policy outlines our approach to managing empty properties ('voids'), to minimise the length of time a property stays empty. This will consequently reduce the loss of rental income and maximise income for the Housing Revenue Account (HRA), while ensuring that applicants in housing need are allocated a suitable property as soon as possible.
69. A property is defined 'void' when no tenancy exists following vacation by the previous occupant, and no rental income is being received. The 'void period' exists between a tenancy ending and a new tenancy beginning.
70. The Council recognises the importance of working to specific timescales in handling voids as part of performance monitoring and ongoing review of operations.
71. The Council is asked to approve the Voids Policy.

Financial implications

72. There are no financial implications for these policies, any work required under these policies will be funded from existing budgets.

Legal issues

73. The policies being presented for approval are required under the Consumer Standard as set by legislation and the Regulator for Social Housing.

Level of risk

74. The failure of the Council to have these asset management policies would go against the Corporate Plan to keep residents safe and could lead to regulatory infringements further to the requirements of the Regulator for Social Housing, the Health and Safety Executive and the Building Services Regulator.

Equalities impact

75. Equality Impact Assessments (EqIA) has been carried out to determine whether the policies being presented to the Cabinet for approval would have an impact on any member of staff, tenants, or contractor workforce, which unfairly discriminates or disadvantages them in the context of the Equality Act 2010.

76. Whilst the EqIA has identified that there are no particular groups who will be unlawfully disadvantaged by these policies, it is identified that there are certain groups at increased risk from safety infringements. These groups are:

- children
- adults with learning difficulties
- oxygen users
- people taking certain medication
- those suffering the effects of drugs and alcohol
- adults aged 65 and older
- people with disabilities who may not be able to quickly escape in the event of an emergency due to reduced mobility
- Individuals being supported by the Community Safety team and related support services

77. These policies aim to reduce the risks to these groups of people through proactively identifying these risk factors, raising awareness and education.

Carbon and Environmental Considerations

78. Adoption of these policies will contribute towards the good maintenance of properties.

Conclusion

79. By approving these policies, this will help establish the framework to maintain the housing stock and further ensure the safety of our residents. This approval would also help meet the expectations of the Regulator of Social Housing that the Council is meeting its regulatory obligations. Further HRA policies will be presented to the Cabinet and Council for consideration after residents have been able to assess and, if necessary, amend draft proposals.

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Background Papers:

- 1 Consumer Standard – Regulator of Social Housing - [Regulatory standards for landlords - GOV.UK](#)
- 2 Social Housing (Regulation) Act 2023 - [Landmark Social Housing Act receives Royal Assent to become law - GOV.UK](#)

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