REPORT TO:	Cabinet
DATE:	12 November 2024
SUBJECT:	Social Housing Regulation – Q2 2024/25 review
PURPOSE:	To provide Cabinet with an update on progress made towards meeting the outcomes of the Social Housing (Regulation) Act 2023, including revised consumer standards.
KEY DECISION:	No
PORTFOLIO HOLDER:	Portfolio Holder for Strategic and Operational Housing
REPORT OF:	Jason King, Assistant Director - Housing
REPORT AUTHOR:	Vikki Cherry, Housing Transformation Programme Manager
WARD(S) AFFECTED:	All Wards
EXEMPT REPORT?	No

SUMMARY

The Regulator of Social Housing adopts a co-regulatory approach, holding Councillors responsible for ensuring that the Council, in its role as a registered provider of social housing, is delivering the outcomes of consumer standards.

This paper reflects on the changes introduced by the Social Housing (Regulation) Act 2023 and the Council's progress towards meeting the outcomes of the consumer standards.

RECOMMENDATIONS

That Cabinet notes the work underway to align services with the new regulatory regime and notes the Council's progress towards delivering the outcomes of the consumer standards.

REASONS FOR RECOMMENDATIONS

To provide assurance to Cabinet on the Council's preparations for regulatory inspection and provide updated information on ongoing work towards meeting the outcomes of the consumer standards.

OTHER OPTIONS CONSIDERED

Do nothing – to retain progress updates through operational arrangements with the Portfolio Holder for Strategic and Operational Housing. This option is not considered to be appropriate as the Regulator of Social Housing is clear that Councillors are responsible for ensuring that the Council, in its role as a registered provider, is meeting the regulatory standards set.

1. BACKGROUND

1.1 Managing over 3,800 properties, South Holland District Council is the largest Registered Provider in the district. From 1 April 2024, expectations on Registered Providers changed, with a focus on property condition, tenant experience and accountability. Social housing landlords must meet revised consumer standards set by the Regulator of Social Housing. The Regulator is not prescriptive about how landlords should achieve the required standards, instead emphasises that landlords should work with tenants to define the services and approaches that meet tenants needs and service expectations, agreeing them on a local level.

1.2 Quarterly updates are provided to Cabinet to provide assurance on the Council's preparations for regulatory inspection and provide updated information on ongoing work towards meeting the outcomes of the consumer standards.

2 REPORT

2.1 Social Housing sector update

2.2 Regulatory Judgements have been published for 16 Councils, of which 5 Councils have been graded C2, 10 Councils graded C3 and 1 Council graded C4. (C1 being the highest and C4 the lowest grade). C4 is categorised as "very serious failings with improvement needed." In their press release, the Regulator stated "The breadth and scale of these failings, including very serious health and safety issues, pose an unacceptable risk to tenants' well-being". C3 gradings "serous failings in delivering the outcomes of the consumer standards" appear to be issued due to failings around health and safety and compliance. The Housing Transformation Team reviews all judgements and reports findings to the Housing Landlord Board, making recommendations for any additional items to be added to the Programme and/or picked up by service managers.

2.3 To provide an additional layer of assurance to Cabinet, an audit has been added to the Internal Audit programme for 24/25 to provide assurance on the Council's preparedness for the regulatory change and inspection regime. This will include a review of diagnostic work and validation of the Housing Transformation and Service Improvement Programme. The audit will focus on key controls in respect of the risks identified covering the following:

- Impact assessments (i.e. health check and LGA work)
- Implementation Plans
- Stakeholder engagement
- Monitoring and review processes of the programme
- Resourcing arrangements to deliver the programme
- Officer and Member awareness of regulatory change and requirements.

The audit will commence during Q4 2024/25.

2.4 **Meeting the outcomes of the consumer standards**

Consumer Standard	Steps achieved towards compliance with this standard in the last quarter (in addition to those previously reported)	Areas identified where work is ongoing
The Safety and Quality Standard Requires landlords to provide safe and good-quality homes for their tenants, along with good-quality landlord services.	• Conducted a Quality and Safety Standard assessment on records held on compliance and health and safety – see appendix A for further information. • Surveyed a sample of 50 properties as part of the stock condition surveys contract to embed and agree processes. This contract is now being rolled out with all properties being inspected over the next 12 months. • Improvements made to case management of damp, condensation and mould complaints, including reviewing all records, checking cases have been closed down correctly (with tenants) and moving the work (and two officers) from Property Services into the Housing Repairs service. (Considered more appropriate to sit within this service as it is a responsive service). Self-assessment and recommendations established in response to Housing Ombudsman Spotlight Report. • Established a new performance metric for monitoring overdue repairs (in anticipation of being a requirement from 1 April 2025). • Discussions held with contractors around sharing and utilising data they collect on tenant satisfaction. • Contract management training programme established with PSPS Procurement as a pilot for the Council.	• Deliver a programme of property stock condition surveys and determine appropriate intervals for future surveys. • Enhance case management of no access cases. • Deliver an Aids and Adaptations policy, involving tenants. • Adopt an Asset Management Strategy. • Enhance our service provision in response to Awaabs law, with legislated timescales to carry out repairs to hazards including damp and mould – final detail still to be determined by DLUHC and Regulator of Social Housing. • Review Repairs policy, considering tenants views and diverse needs. • Report arrangements determined on informing Members and Senior Officers on disrepair, Housing Ombudsman and Building Safety Regulator findings. • Enhance communication with tenants for major repairs where work is outsourced – confirming start and completion dates. • Timescales and priorities for repairs reviewed – responses to take into account protected characteristics. • Online reporting of repairs rolled out (in addition to telephone option).

Consumer Standard	Steps achieved towards compliance with this standard in the last quarter (in addition to those previously reported)	Areas identified where work is ongoing
The Transparency, Influence and Accountability Standard 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.	• Held a "Meet the Housing Ombudsman" event on 7 October 2024. • Completed a tenant survey with other 400 responses received, recording how tenants would like to be informed about our services and a landlord vision. Two rounds of focus groups held and an Engagement Framework being drafted to be shared with Members shortly. • Governance Framework reviewed by Policy Development Framework and presented to Cabinet on 12 November 2024 for adoption. (Formalising new, enhanced governance arrangements). • Complaint handling for Housing permanently moved into Housing Landlord Service, delivering a more streamlined and efficient service (due to reduced timescales to investigate complaints). Complaints Officer added to establishment 2 year fixed term, grade D part time. Approach established for Cabinet to receive six monthly reports on progress, themes and improvements, commencing 12 November 2024. • Knowledge and Information Management Strategy reviewed by Policy Development Framework and presented to Cabinet on 12 November 2024 for adoption. <u>Tenant Satisfaction Measures</u> • Contract procured to complete the surveys over the next 3 years with surveys anticipated to be conducted during early winter 2024. • Officers have been informed that additional management data will be required in 2025 regarding overdue repairs. This data will be collated and reported to Compliance Clinic from Q3 24/25.	• Identify further opportunities to give tenants a more meaningful role in monitoring and scrutinising performance. • Establish a variety of mechanisms for tenants to engage, making sure that the tenant voice is captured, helps inform design and there is an effective feedback loop in place. • Produce a landlord vision with tenants and deliver an engagement strategy. • Use tenant census data to adapt services and communications to meet individual tenant needs. • Enhance service levels to ensure tenants' lived experience actively informs service improvements. • Ensure staff continue to exhibit appropriate behaviours and attitudes towards tenants in line with the competence and conduct standard. • Support tenant led activities and secure a budget.

Consumer Standard	Steps achieved towards compliance with this standard in the last quarter (in addition to those previously reported)	Areas identified where work is ongoing
The Tenancy Standard Sets requirements for the fair allocation and letting of homes, as well as requirements for how tenancies are managed by landlords.	• No further progress. As per Transformation programme, focus during Q2 has been governance, complaint handling, data efficacy and tenant engagement.	• Establish arrangements to review third party authority arrangements on a regular basis to protect tenants. • Strengthen quality assurance of lettings and nominations, and case management of tenancy support cases. • Data reporting on themes and trends of tenancy support cases to tailor service improvements • Customer experience surveys to be completed when notice is received from tenants. • Long term arrangements for provision of tenancy support service. • Revised Tenancy Management Policy and Tenancy Strategy. • Enhance the mutual exchange service for tenants that require support. • Review mutual exchange paperwork with tenants. • Review communications with tenants around tenancy terminations to ensure it is clear and support is clearly offered. • Publish data on allocations and lettings including appeals and outcomes. • Review lettings criteria for sheltered housing, following the new service offer going live in July 2024. • Determine levels of under occupancy/overcrowding, producing a policy to assist tenants to move. • Enhance monitoring of introductory tenancies including quality assurance regarding home visits and administration of tenancies. • Produce a Tenancy Fraud policy including a programme of property inspections and tenancy fraud checks, as well as data reporting. • Lettings process and literature reviewed with tenants.

Consumer Standard	Steps achieved towards compliance with this standard in the last quarter (in addition to those previously reported)	Areas identified where work is ongoing
Neighbourhood and Community Standard 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.	• No further progress. As per Transformation programme, focus during Q2 has been governance, complaint handling, data efficacy and tenant engagement.	• Adopt a Service Level Agreement with Community Safety Team and complete further reviews of SLA's to determine whether additional services are required. • Deliver more frequent estate inspections on a programmed basis, involving tenants. • Develop a suite of policies including a Domestic Abuse Policy, Anti-social Behaviour Policy, Hate Crime Policy and Under-Occupancy Policy. • Introduce more dynamic KPIs around neighbourhood and communal area management. • Improve case management of anti-social behaviour cases (including KPI's), working closer with partnership agencies and tenants to tackle anti-social behaviour. • Improve case management and oversight of domestic abuse and safeguarding cases. • Work with relevant partners to promote social, environmental, and economic wellbeing in the neighbourhood.
NEW Competence and Conduct Standard NOTE - The Government is yet to issue final direction on this Standard	• Working group established with HR and Housing to deliver requirements. • Managers commenced studies for qualifications required.	• A requirement for registered providers to have a written HR policy for managing the skills, knowledge, experience, learning and development, and conduct of all their staff (including appraising staff and managing poor performance). (This document is required to be tailored to roles within the Housing Service). • Adoption of a code of conduct, tailored to Housing roles, ensuring staff are displaying the right behaviours, attitudes and empathy to tenants. • Mandatory qualifications - Senior housing managers and executives must undertake qualifications in housing management with 50% to be enrolled by April 2026 and all qualified by April 2028. Through voluntary engagement, the Council can demonstrate compliance with requirements.

2.5 **Rent standard**

2.6 Social housing landlords must meet the rent standard, set by the Regulator of Social Housing. A rent standard is published annually by the Regulator confirming the maximum rent adjustment for the following financial year.

2.7 A submission has been completed for 23/24. No further updated necessary until 2025.

2.8 **Housing Ombudsman Complaint Handling Code (1 April 2024)**

2.9 An Annual Complaints, Performance and Service Improvement report has been drafted summarising complaint themes, trends and improvements for 23/24.

2.10 Data on complaints continues to be reported monthly and quarterly at relevant Housing Clinics. Six monthly updates will be provided to Cabinet as part of a separate report, commencing November 2024.

2.11 **Housing Landlord Strategy and Transformation and Service Improvement Programme update**

2.12 The following progress has been made towards delivering the Housing Landlord Strategy:

- Culture and Operational Excellence -Vision being written with tenants as part of tenant focus groups (TPAS work). Learning and development programme adopted for Officers. Procurement contract management training programme established with PSPS to deliver enhanced contract management. Housemark completing resourcing benchmarking against other similar sized Councils. Complaint handling permanently brought into Housing.
- Quality Homes and Connected Neighbourhoods – sample survey of 50 properties completed by contractor completing stock condition surveys (and fed into HRA business plan modelling), Quality and Safety away day completed focussed on checking compliance certification is in place, new performance indicator established for overdue repairs.
- Accountability and Transparency – Tenant Satisfaction Measure contract awarded for 24/25. Knowledge and Information Management Strategy (and action plan) drafted. Remuneration and management costs being benchmarked by Housemark, and accounts benchmarked also. Self-assessments completed against Housing Ombudsman Spotlight reports for Knowledge and Information Management and Damp, Condensation and Mould. Performance information published on Housing webpage.
- Tenant Voice and Opportunity – surveys and focus groups held with tenants to being the reengineering of tenant engagement offering. Surveys beginning to be rolled out in service areas including complaint handling, contractor appointments and damp and mould complaints. Exercise completed to map out barriers for diverse tenants in accessing services with an action plan created.

2.13 Louis Humphreys joined the team in October in the role of HRA Transformation Officer bringing forward transformation in Property Services and Housing Repairs (in response to budget pressures).

2.14 The Programme is currently on track with progress monitored by the Housing Landlord Transformation and Improvement Programme Board, sponsored by the Deputy Chief Executive (Corporate Development and s151 Officer. Meetings are held quarterly and chaired by the Portfolio Holder for Strategic and Operational Housing.

2.15 Projects are progressing as follows:

- Governance project (commenced December 2023) – Complete (apart from ongoing work related to HRA business plan). "Significant positive progress has been made with clear governance arrangement in place for the service" LGA Peers September 2024.
- Complaint handling project (commenced March 2024) – Complete.
- Tenant Engagement project (commenced May 2024) – phase 1 of 3 due for completion by end of Q3.
- Data project: foundations (commenced June 2024) – Knowledge and Information Strategy adopted and action plan created. Mapping exercise regarding barriers for diverse tenants in accessing the service completed and solutions delivered.
- NEW Competence and Conduct (commenced September 2024) – Working Group established with HR.
- NEW Disabled aids and adaptations project (commenced October 2024) – current focus is mapping existing arrangements.

2.16 **Responses submitted to MHCLG/Housing Ombudsman consultations**

2.17 There have been no additional consultations held since the previous Cabinet meeting.

2.18 Findings are expected to be published on outcomes of consultations on the Competence and Conduct Standard (MHLCG) and Awaab's Law (MHCLG) this autumn. New consultations expected this winter on a new Minimum Energy Efficiency Standard (EPC C).

3. CONCLUSION

3.1 The legislative and regulatory changes which have been introduced are significant and wide-reaching, impacting the operational and strategic approaches taken in delivering housing services in the future, including where funds are allocated, the range of data collected and the way our tenants are involved in all that we do.

3.2 To summarise, the following have been RAG rated:

Item	RAG rating	Comments
Consumer Standards		Our assessment does not highlight issues of material concern, however there are areas for improvement including tenant engagement and scrutiny (first phase of work commenced), stock condition data (contract awarded to survey all stock), updating the HRA business plan (contract awarded), producing additional polices (with tenants), taking additional steps to adjust our

		service offer for those with protected characteristics.
Rent standard		Data submitted for 2024/25
Tenant Satisfaction Measures		Data submitted to Regulator and published with tenants. Being discussed at PMP in December following Regulator publishing national data in the autumn. Contract procured for 2024/25
Housing Ombudsman Complaint Handling Code		Policy updated and self-assessment completed. End of year reflection document drafted. Six monthly updates going to Cabinet.
Competence and conduct standard		5 Officers enrolled onto qualification. HR policy and Housing Code of Conduct to be produced.

3.3 The progress of the Housing Landlord Service continues to be monitored by the Housing Transformation and Service Improvement Programme Board (sponsored by the Deputy Chief Executive (Corporate Development) and s151 Officer and chaired by the Portfolio Holder for Strategic and Operational Housing). Service performance continues to be monitored by the Assistant Director Housing and reported through the newly established Housing Compliance and Housing Governance Clinic, followed by formal scrutiny oversight.

3.4 Tenant scrutiny and opportunities for engagement continue to highlight gaps, however this has begun to be addressed as part of the re-engineering engagement piece of work.

3.5 Work will continue throughout the year to strengthen the position with updates provided to Cabinet on a quarterly basis.

4. EXPECTED BENEFITS TO THE PARTNERSHIP

4.1. There are no immediate benefits to the Partnership. However, South Holland as a sovereign partner Council continues to contribute to the overall reputation of the Partnership. Therefore, continuing to show preparedness for an upcoming external inspection will support the Partnership's reputation.

5. IMPLICATIONS

5.1. **SOUTH AND EAST LINCOLNSHIRE COUNCILS PARTNERSHIP**

5.2. None.

5.3. **CORPORATE PRIORITIES**

5.4. None**.**

5.5. **STAFFING**

5.6. The Transformation Programme will involve a review of the resourcing and skills of the Landlord Service and arrangements where other Council departments provide services for the Housing landlord Service (funded by the Housing Revenue Account). A paper on resources will be brought to Members in due course.

5.7. The competence and conduct standard requires a Housing landlord specific HR policy and code of conduct. This will affect all Housing staff.

5.8. **WORKFORCE CAPACITY IMPLICATIONS**

5.9. Housing Managers and the Assistant Director – Housing have now commenced their studies. Whilst officers are committed to completing the qualifications, it should be noted that the Chartered Institute of Housing advises that the study requires a commitment of 8 hours per week to be completed (over a period of 12 months).

5.10. Due to increased publicity on complaints by the Council (as required by the Complaint Handling Code) and the Housing Ombudsman, the volume of housing related complaints has increased, placing additional demands on the Housing Managers and Assistant Director – Housing.

5.11. **CONSTITUTIONAL AND LEGAL IMPLICATIONS**

5.12. None.

5.13. **DATA PROTECTION**

5.14. None.

5.15. **FINANCIAL**

5.16. The Social Housing (Regulation) Act 2023 has focussed the Council on the following activities which have incurred the expenditure below for 2024/25:

Q1	HRA Transformation Programme Team (including on-costs)	£145,000
	Property surveys (Cabinet decision 4/6/24)	£275,000
	HRA business plan and asset management strategy (Pro-forma B)	£49,000
	Re-engineering tenant engagement offer and TPAS membership (funded from existing budget)	£13,200
	Housing manager qualifications (funded from existing budget)	£20,000
	Housemark membership (benchmarking)	£5,000
	Association of Retained Council Housing membership (local authority registered providers policy and practice)	£2,000
Q2	Housemark cost mapping exercise	£,1500
	Housing Complaints Officer (cost for six months of 24/25)	£10,000
	Additional HRA Transformation Programme Officer (including on-costs) – Note salary funded from wider salary savings within HRA due to vacant post)	£29k
Total to date for 2024/25		**£550K**

5.17. In addition to the above, the Council is subject to the following mandatory fees for 2024/25:

Regulator of Social Housing	£24k

Housing Ombudsman	£31k
Total for 2024/25	**£55k**

5.18. It is anticipated that additional funding will be required to deliver the following during 2024/25:

- a HR policy and code of conduct (competence and conduct standard)
- tenant engagement – establishing an offering and resources to ensure this becomes part of our housing offer (transparency, accountability and influence standard)
- resources and potential additional contracts to deliver the outcomes of Awaab's Law
- housing qualifications for team leaders as part of professional development (competence and conduct standard)
- Decent Homes 2 – anticipated to be announced by DLUHC this year requiring increased investment in homes.

The cost of these items is currently unknown, and it is likely that additional expenditure will be required as the Programme progresses.

5.19. It is noted that it has been a transitional year for the HRA finances, and additional oversight and scrutiny will be required as part of adopting the HRA Business Plan. The Council was awarded £16k in additional burdens funding in September 2024 towards delivering the Tenant Satisfaction Measure surveys.

5.20. **RISK MANAGEMENT**

5.21. None.

5.22. **STAKEHOLDER / CONSULTATION / TIMESCALES**

5.23. The Portfolio Holder - Strategic and Operational Housing and the Deputy Chief Executive (Corporate Development) and S151 Officer have been consulted. They continue to be regularly updated as Chair and Sponsor, of the Housing Transformation and Improvement Programme Board.

5.24. Regular briefings are being held with Housing Landlord Service Managers, the wider Housing Service, SLT and all Members (informally) to keep them updated on the progress of the Housing Transformation and Improvement Programme and sector updates.

5.25. Quarterly updates will be provided to Cabinet on progress made towards delivering the outcomes of the Social Housing (Regulation) Act 2023, including revised consumer standards.

5.26. **REPUTATION**

5.27. As a Registered Provider, the Council will be subject to inspection by the Regulator of Social Housing at least once during 2024-2028 as per the Social Housing (Regulation) Act 2023. This inspection will determine the frequency of future inspections.

5.28. The increased public focus on social housing issues could increase the risk of reputational damage to the Council if findings of non-compliance were published by the regulator.

5.29. **CONTRACTS**

5.30. None.

5.31. **CRIME AND DISORDER**

5.32. None

5.33. **EQUALITY AND DIVERSITY/ HUMAN RIGHTS/ SAFEGUARDING**

5.34. None.

5.35. **HEALTH AND WELL BEING**

5.36. None.

5.37. **CLIMATE CHANGE AND ENVIRONMENTAL IMPLICATIONS**

5.38. None.

6. ACRONYMS

- SELCP – South and East Lincolnshire Councils Partnership
- MHCLG – Ministry for Housing Communities and Local Government
- PSPSL – Public Sector Partnership Services Limited
- HRA – Housing Revenue Account
- TPAS – Tenant Participation Advisory Services.

APPENDICES
Appendix A – Report to Housing Governance Clinic: Safety and Quality Standard Simulation Exercise held on 30/7/2024.

BACKGROUND PAPERS	
Background papers used in the production of this report are listed below: -	
Document title	**Where the document can be viewed**
Tenant Satisfaction Measures	www.gov.uk/government/publications/tenant-satisfaction-measures-standard/tenant-satisfaction-measures-technical-requirements-accessible-version#introduction
Regulator of Social Housing - Consumer Standards	www.gov.uk/government/consultations/consultation-on-the-consumer-standards
SHDC Landlord Strategy 2024-2026	https://www.sholland.gov.uk/media/24482/SHDC-Housing-Landlord-Strategy-2024-

	2026/pdf/SHDC_Housing_Landlord_Strategy_2024-2026.pdf?m=1707905746373
Housing Ombudsman Complaint Handling Code	https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/

CHRONOLOGICAL HISTORY OF THIS REPORT
A report on this item was previously considered by Cabinet in July 2024.

REPORT APPROVAL	
Report author:	Vikki Cherry, Housing Transformation Manager vcherry@sholland.gov.uk
Signed off by:	Jason King, Assistant Director - Housing jasonking@sholland.gov.uk
Approved for publication:	Councillor Tracey Carter, Portfolio Holder for Strategic and Operational Housing

APPENDIX A

REPORT TO:	Housing Governance Clinic
DATE:	30th October 2024
AUTHOR:	Vikki Cherry, Housing Transformation Manager
SUBJECT:	Safety and Quality Standard Simulation Exercise held on 30/7/2024
PURPOSE:	To update Housing Governance Clinic on the progress towards delivering actions set following the Safety and Quality Standard Simulation Exercise held on 30/7/2024
RECOMMENDATIONS:	That the progress towards delivering the action plan is noted.

1. BACKGROUND

1.1. An exercise was held with the Property Services and Housing Repairs Team on 30/7/24 to test assurance against meeting the outcomes of a section within the Regulator of Social Housing's Quality and Safety Standard.

1.2. A report was presented to Housing Compliance Clinic on 28 August 2024 (appendix A) setting out the findings from the day along with a list recommendations. The Clinic adopted the list of recommendations.

1.3. On reflection, it has been determined that exercise 2 of the Electrical Safety checks was incorrectly categorised as 'amber'. This should have been categorised as 'red', with the amendments made to the table below (1.4). (No other changes are considered necessary).

1.4.

Electrical safety

Exercise 1 – certificates and remedials

Exercise findings:	Green
Scope of exercise:	Electrical safety certificates dated within the last 5 years and evidence that any remedials recommended have been completed for 80 properties chosen at random.
Outcome:	100% of evidence requested was supplied during the exercise. Of the certificates provided, there were no C1 or C2 remedial actions outstanding. A variety of C3 recommendations were outstanding ('improvement recommended'), however all certificates supplied were determined as 'satisfactory'.

Action required:	a. Policy statement to be drafted around approach to C3 recommendations b. Review approach with Housing Delivery Team regarding filing of new build certificates, including shared ownership

<u>Exercise 2 – tenant confirmation of receipt of electrical safety certificates</u>

Exercise findings:	Red
Scope of exercise:	Officers to phone 10 tenants that have had a safety check in the last month and confirm that tenants have received a copy of their safety check certificates.
Outcome:	4 tenants successfully contacted. Of those contacted, 2 tenants were unsure if they received a copy of the certificate, 1 tenant said it wasn't provided and 1 couldn't understand what the officer was asking for.
Note:	Legislation changed in April 2024 around providing tenants with a copy of the certificates.
Action required:	Contract review meeting to take place to ensure certificates are issued, adopting the same process as gas safety. Due to the recent change in legislation, certificates held by the Council will not be issued retrospectively, however the website will be updated to advise tenants how they can obtain a copy of the certificate should they wish to do so.

<u>Exercise 3 – electrical safety procedure</u>

Exercise findings:	Green
Scope of exercise:	Electrical safety procedure to be provided.
Outcome:	100% of evidence supplied.
Action required:	Procedure documents to be dated and planned reviews programmed in.

2. PROGRESS TOWARDS DELIVERING ACTIONS

Action	Recommendation	Priority	Officer Responsible	Due date	Progress update
QS1	Produce a 'busy persons guide' recording where evidence is stored.	6 months	Housing Property and Repairs Manager	28/2/2025	On track

QS2	Review access to contractor portals – check that there is sufficient access to the relevant portals by both the Property and Repairs Teams with no single points of failure	3 months	Housing Property and Repairs Manager	30/11/2024	On track
QS3	Review corrupt fire risk assessment evidence files (approx. 8 photos corrupt within the 23/24 action folder).	1 month	Housing Property and Repairs Manager	30/9/2024	Complete, action closed.
QS4	To source outstanding smoke detection testing/servicing records.	1 month	Housing Property and Repairs Manager	30/9/2024	Complete, action closed.
QS5	To carry out an exercise focused specifically on testing records for installation of smoke detection systems in properties with storage heaters.	3 months	Housing Property and Repairs Manager	30/11/2024	Complete, action closed.
QS6	Consider carrying out telephone exercise with tenants again to confirm receipt of gas safety certificates/adding telephone calls to sample audit checks.	6 months	Housing Property and Repairs Manager	28/2/2025	On track
QS7	Draft a policy statement around approach to C3 electrical safety recommendations	6 months	Housing Property and Repairs Manager	28/2/2025	On track
QS8	Review approach with Housing Delivery Team regarding filing of new build electrical safety certificates, including shared ownership.	6 months	Housing Property and Repairs Manager	28/2/2025	On track
QS9	Contract review meeting to take place to ensure electrical safety certificates are issued to tenants, adopting the same process as gas safety. Due to the recent change in legislation, certificates held by the Council will not be issued retrospectively, however the website should be updated to advise tenants how they can obtain a copy of the	3 months	Housing Property and Repairs Manager	30/11/2024	Complete, action closed.

	certificate should they wish to do so.				
QS10	Damp, condensation and mould exercise to be carried out again.	3 months	Transformation Team	30/11/2024	Complete, action closed.
QS11	Ensure exercise of transferring of liability of sewage discharge and treatment is completed.	1 month	Housing Property and Repairs Manager	30/9/2024	Overdue – The Council has entered a long term contract for the maintenance of Sewage Treatment Works. The Council is aware of other contracts of a similar type where discharge consents have been transferred to the contractor. The Council have received evidence of ongoing dialogue between the contractor and the Environment Agency, however, it is noted that agreement of the Environment Agency is required before this matter can be concluded. Progress is being twin tracked by the service and Contracts and Procurement Team.
QS12	Risk register to be amended to reflect the situation pending switchover to new contractor. (Sewage contract).	1 month	Housing Property and Repairs Manager	30/9/2024	Complete, action closed.
QS13	Upload evidence of transfer of liability for sewage discharge and treatment to the intranet.	1 month	Housing Property and Repairs Manager	30/9/2024	Overdue – see QS11.
QS14	Property Services procedures to be dated and planned reviews programmed in	6 months	Housing Property and Repairs Manager	28/2/2025	On track
QS15	Monitor themes and trends regarding repeat pull cord self-testing (due to no access)	6 months	Housing Services Manager	28/2/2025	On track
QS16	Upload a copy of qualifications for Housing Repairs Team to the intranet and ensure it is accessible	6 months	Housing Property and Repairs Manager	28/2/2025	On track
QS17	To ensure all ladder checks are completed and there is a programme in place	1 month	Housing Property and Repairs Manager	30/9/2024	Complete, action closed.
QS18	Ascertain situation regarding EPCs on green homes including progress regarding accessing properties where this is	3 months	Housing Property and Repairs Manager	30/11/2024	Complete, action closed.

	being refused. Outstanding EPCs to be sought.				
QS19	Conduct EPC exercise again.	3 months	Housing Transformation Team	30/11/2024	On track
QS20	Survey all community centres, flat schemes and guest rooms to ensure the relevant literature is displayed on site, and where applicable, Gerda boxes installed.	3 months	Housing Services Manager	30/11/2024	On track
QS21	Establish a programme of notice board checks in community centres to ensure required literature continues to be displayed and is kept up to date.	6 months	Housing Services Manager	28/2/2025	On track
QS22	Collate outstanding contractor information.	1 month	Housing Property and Repairs Manager	30/9/2024	Complete, action closed.
QS23	Gain evidence of gas safety quality safety checks completed within the last 3 months.	1 month	Housing Property and Repairs Manager	30/9/2024	Complete, action closed.

ends

APPENDICES

Appendix 1 – Report to Housing Compliance Clinic dated 28/8/24 - Safety and Quality Standard Simulation Exercise held on 30/7/2024.

Appendix 1

REPORT TO:	Housing Compliance Clinic
DATE:	28th August 2024
AUTHOR:	Adel Gardner, Housing Transformation Officer and Vikki Cherry, Housing Transformation Manager
SUBJECT:	Safety and Quality Standard Simulation Exercise held on 30/7/2024
PURPOSE:	To update Housing Compliance Clinic on the outcome of the Safety and Quality Standard Simulation Exercise held on 30/7/2024
RECOMMENDATIONS	1. That the action plan is adopted 2. That progress towards delivering the action plan is reported at each Housing Compliance Clinic meeting 3. That a summary of the findings is reported to Cabinet as part of the next Transformation Programme Update paper

3. BACKGROUND

3.1. An exercise was held with the Property Services and Housing Repairs Team to test assurance against a section within the Regulator of Social Housing's Quality and Safety Standard.

3.2. *2.2 Health and Safety*

2.2.1 Registered providers must identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas.

2.2.2 Registered providers must ensure that all required actions arising from legally required health and safety assessments are carried out within appropriate timescales.

2.2.3 Registered providers must ensure that the safety of tenants is considered in the design and delivery of landlord services and take reasonable steps to mitigate any identified risks to tenants.

4. SCOPE OF EXERCISE

4.1. An exercise was carried out with the Property Services and Housing Repairs Team, testing how they obtained information in a real-life regulatory inspection scenario.

4.2. The objective of the exercise was to evidence how we know that the Council is meeting all legal requirements that relate to the health and safety of tenants in their homes and communal areas. Focussing on ease of accessing evidence, whether there are any gaps in evidence and any single points of failure.

4.3. A list of properties was provided to the team on the day, and they were asked to provide specific items of evidence. The sample was chosen by the Transformation Team with no other parties involved, ensuring that the outcome provided a true representation of the situation. Property sample sizes varied based on risk and asset involved. Spreadsheets were determined not to be an acceptable form of evidence, with records and certificates requested as evidence. If evidence was not available due to access issues, evidence of attempts at access were requested.

4.4. Properties chosen were based on a random selection across the portfolio including:

- properties subject to a mutual exchange over the last 6 months
- void properties during the last 12 months
- general needs housing
- sheltered housing (including community centres and guest rooms)
- shared ownership properties purchased within the last 6 months
- temporary accommodation
- specialist homeless accommodation – included wherever possible due to the level of risk posed based on occupancy numbers.

4.5. Site inspections were also carried out to confirm required information was displayed.

5. OVERALL ASSESSMENT

5.1. The exercise has provided assurance to the Person Responsible for Compliance with the Consumer Standards and the Lead Officer for Health and Safety. No material issues relating to non-compliance or potential non-compliance with delivering the Consumer Standards or Health and Safety requirements were identified as part of this exercise.

5.2. Whilst there are no material concerns, there are some areas for improvement in delivering the outcomes of section 2.2 of the Safety and Quality Standard.

6. KEY STRATEGIC FINDINGS

6.1. Accessing information required was a challenge for the team. Contractor portals, internal spreadsheets and document access caused delays and there were some inabilities to locate evidence, although the authority did hold the records.

6.2. There was strong evidence base for the following:

- compliance with fire safety, asbestos, lifts, legionella, electrical and gas safety requirements along with procedures supporting arrangements for gas and electrical safety
- discharge consent for sewage treatment works
- annual solid fuel and oil heating inspections
- quarterly Sheltered Housing pull-cord testing
- health and safety responsibilities involved with employing operatives through a Direct Labour Organisation: Risk assessments and Safe Systems of Work documents.

6.3. Some improvement is required in the following areas:

- Housekeeping:

    - structured record keeping ensuring evidence is easy to access. (Noting that there are no concerns to suggest that evidence does not exist.)
    - programme of checks to ensure contractor records remain up to date e.g. copies of insurance policies and risk assessments; and
    - documents displayed in communal areas remain up to date and valid e.g. asbestos management plans displayed on community centre noticeboards.
- Additional steps are required around evidencing successful case management of reports of Damp, Condensation and Mould. Data is reported monthly to Housing Compliance Clinic. Enhancements have recently been made to the process including review of triage process, amendments to DCM policy and amendments to the procedure around recommendations of survey. Officers were unable to evidence success of changes as they needed time to embed them. It is recommended that this exercise is conducted again during 2024/25 to evidence the changes have worked.
- Proof of transfer of liability of sewage treatment was not able to be provided. This urgently needs addressing with the Environment Agency to mitigate the risk posed to the authority around discharge of sewage, and the risk register amending to reflect this pending switchover. (Note that there is no evidence to suggest that the Council is not meeting its discharge consents through the performance of the current contractor.)
- Whilst evidence of ladder checks (within Housing Repairs) was supplied for 2023, they had expired in June 2024. It is proposed that a programme is established to allow for greater oversight.
- Limited evidence was supplied for Energy Performance Certificates. A contract is in place to ensure that all outstanding EPC's are completed as part of the stock condition surveys programmed in over the next 12 months. The properties selected as part of the exercise were homes that had recently had energy efficiency works completed and so further work is required to understand why these certificates are outstanding and confirmation that issues with gaining access are being managed as per the 'no access' procedure. It is recommended that this exercise is conducted again during 2024/25.

7. ACTION POINTS

To be completed within 1 month	To be completed within 3 months	To be completed within 6 months
8	7	6

8. FINDINGS

8.1. The following RAG rating system has been used:

Key:

Red	No evidence available
Amber	Limited evidence available
Yellow	Reasonable evidence available
Green	Substantial evidence available

8.2. Session one FLAGE:

Fire safety

Exercise 1 – Fire Risk Assessments

Exercise findings:	Green
Scope of exercise:	Fire Risk Assessments dated within the last 12 months and evidence confirming that the first 50% of actions have been completed for 15 properties chosen at random.
Outcome:	100% of risk assessments supplied as evidence during the exercise. 100% of evidence supplied to confirm actions have been completed, where applicable. Where actions remain open, evidence has been supplied of progress to date e.g. works on order. The exercise identified that six records showing photos as evidence were corrupt.
Action required:	To review corrupt fire risk assessment evidence files (approx. 6 photos corrupt within the 23/24 action folder).

Exercise 2 – Smoke detection systems

Exercise findings:	Yellow
Scope of exercise:	Evidence of test within the last 12 months for general needs and servicing within the last 12 months for sheltered housing requested for 50 properties.
Outcome:	96% of records provided evidenced annual testing/servicing with evidence outstanding for 2 properties.
Action:	a. To source outstanding smoke detection testing/servicing records for 2 properties. b. To carry out an exercise focused specifically on properties with storage heaters.

Exercise 3 – Monthly fire safety checks (communal areas)

Exercise findings:	Green
Scope of exercise:	Evidence required of monthly fire checks completed in the last month, across 5 properties.
Outcome:	100% of documentation supplied.
Action required:	None.

Exercise 4 – Fire Door Register

Exercise findings:	Green
Scope of exercise:	Fire door register to be provided and up to date.
Outcome:	100% of documentation supplied.
Action required:	None.

Legionella

Exercise findings:	Green
Scope of the exercise:	Risk assessments dated within the last 24 months, service report sheets and evidence of monthly flushing of systems for 5 properties chosen at random.
Outcome:	100% of risk assessments were provided.
Action required:	None.

Asbestos

Exercise findings:	Green
Scope of exercise:	Asbestos management plans dated within the last 12 months and, evidence of any remedials being actioned was requested for 10 properties.
Outcome:	100% of evidence requested was supplied, no remedials outstanding.
Action required:	Note that asbestos management plans supplied expire August 2024.

Gas safety

Exercise 1 – certificates and remedials

Exercise findings:	Green
Scope of exercise:	Gas Safety certificate dated within the last 12 months, evidence that remedial work has been completed (where applicable) and record that a carbon monoxide detector is in situ for 105 properties.

Outcome:	100% of evidence requested was supplied, no remedials outstanding.
Action required:	None.

Exercise 2 – tenant confirmation of receipt of gas safety certificates

Exercise findings:	Green
Scope of exercise:	Officers to phone 10 tenants that have had a safety check in the last 1 month and confirm that tenants have received a copy of their safety check certificates.
Outcome:	4 tenants successfully contacted for Gas Safety, of which all confirmed receiving a copy of their safety certificate.
Action required:	Due to small sample size confirming receipt of certificates, consider carrying exercise again/adding to sample audit.

Exercise 3 – gas safety procedure

Exercise findings:	Green
Scope of exercise:	Gas safety procedure to be provided.
Outcome:	100% of evidence supplied.
Action required:	Procedure documents to be dated and planned reviews programmed in.

Electrical safety

Exercise 1 – certificates and remedials

Exercise findings:	Green
Scope of exercise:	Electrical safety certificates dated within the last 5 years and evidence that any remedials recommended have been completed for 80 properties chosen at random.
Outcome:	100% of evidence requested was supplied during the exercise. Of the certificates provided, there were no C1 or C2 remedial actions outstanding. A variety of C3 recommendations were outstanding ('improvement recommended'), however all certificates supplied were determined as 'satisfactory'.
Action required:	c. Policy statement to be drafted around approach to C3 recommendations d. Review approach with Housing Delivery Team regarding filing of new build certificates, including shared ownership

Exercise 2 – tenant confirmation of receipt of electrical safety certificates

Exercise findings:	Amber
Scope of exercise:	Officers to phone 10 tenants that have had a safety check in the last month and confirm that tenants have received a copy of their safety check certificates.
Outcome:	4 tenants successfully contacted. Of those contacted, 2 tenants were unsure if they received a copy of the certificate, 1 tenant said it wasn't provided and 1 couldn't understand what the officer was asking for.
Note:	Legislation changed in April 2024 around providing tenants with a copy of the certificates.
Action required:	Contract review meeting to take place to ensure certificates are issued, adopting the same process as gas safety. Due to the recent change in legislation, certificates held by the Council will not be issued retrospectively, however the website will be updated to advise tenants how they can obtain a copy of the certificate should they wish to do so.

Exercise 3 – electrical safety procedure

Exercise findings:	Green
Scope of exercise:	Electrical safety procedure to be provided.
Outcome:	100% of evidence supplied.
Action required:	Procedure documents to be dated and planned reviews programmed in.

Lift safety

Exercise findings:	Green
Scope of exercise:	Annual service record and evidence of quarterly maintenance check (dated within the last 3 months) for all 3 passenger lifts.
Outcome:	100% of evidence requested was provided.
Action required:	None.

Damp, condensation and mould	
Exercise findings:	Amber
Scope of exercise:	Evidence of remedial work ordered; completion of remedial work; case closure and tenant satisfaction for 50 properties.
Outcome:	90% of evidence requested supplied to confirm remedial works were ordered 38% of evidence requested supplied to confirm completion of works 38% of evidence requested supplied to confirm case closure. Unable to supply evidence to confirm tenant satisfaction.
Note:	Extensive review ongoing regarding damp and mould process and case management. Unable to provide evidence regarding tenant satisfaction as part of this exercise, however a piece of work commenced early July 2024 to contact all tenants by telephone to seek satisfaction. Further work is underway to triangulate findings per property, led by the Housing Repairs and Property Services Manager, with progress reported to the Assistant Director-Housing and Portfolio Holder for Strategic and Operational Housing on a monthly basis.
Action required:	Full exercise to be carried out again to show that new process has been embedded.

8.3. <u>Session two housekeeping, procedural compliance:</u>

Sewage treatment works	
Exercise findings:	Amber
Scope of exercise:	Evidence of discharge consent being met and proof of transfer to the new contractor (list of consents) required for 10 randomly selected properties.
Outcome:	100% of evidence supplied confirming discharge consent. No evidence supplied confirming transfer of liability to new contractor.
Action required:	a. Ensure exercise of transferring of liability of sewage discharge and treatment is completed and records saved. b. Risk register to be amended to reflect the situation pending switchover to new contractor.

Solid fuel/oil heating system inspections	
Exercise findings:	Green
Scope of exercise:	Evidence of inspection within the last 12 months and evidence of any remedials, where appliable, requested for 10 properties chosen at random.
Outcome:	100% of certification supplied with no remedials outstanding.
Action required:	None
Sheltered Housing pull cord testing	
Exercise findings:	Green
Scope of exercise:	Evidence that 15 sheltered housing properties (chosen at random) have had their pull cord system tested
Outcome:	100% of evidence provided.
Action required:	a. Monitor themes and trends regarding repeat self-testing due to no access

Housing Repairs documents	
Exercise findings:	Yellow
Scope of exercise:	To provide evidence of ladder checks, specific risk assessments, safe systems of work documents and operative qualifications.
Outcome:	All risk assessments and safe systems of work provided. 2/5 valid ladder checks provided. Gas safe registration provided. NICEIC registration number provided however no evidence submitted.
Note:	Proof of gas and electrical qualifications per engineer not provided at the exercise, however confirmed by Housing Repairs Manager that he signs them off on an annual basis.
Action required:	a. To upload a copy of qualifications for Housing Repairs Team to the intranet and ensure it is accessible b. To ensure outstanding ladder checks are completed

EPCs	
Exercise findings:	Amber

Scope of exercise:	Evidence required of EPCs from 10 properties (randomly selected)
Outcome:	50% of evidence supplied. 5 EPCs successfully located.
Note:	Contract awarded to survey all stock over the next 12 months and secure an EPC where there is no record.
Action required:	a. Ascertain situation regarding EPCs on green homes. Outstanding EPCs to be sought. b. Conduct exercise again.

Contractor Checks	
Exercise findings:	Amber
Scope of exercise:	Evidence of insurance dated within last 12 months; minutes from meeting with SHDC dated within the last 2 months; qualifications for engineers; proof of registration with organisation e.g. gas safe, where applicable; risk assessments for the work they are contracted to do by SHDC; and evidence of contractor carrying out quality control checks, dated within the last 3 months, if applicable to be supplied for all FLAGE contractors plus damp, condensation and mould contractors.
Outcome:	Electrical – Evidence of insurance and registration provided. Copy of meeting minutes and risk assessments not supplied. Water Safety – Proof of minutes, risk assessments and evidence of quality control checks provided. Qualifications for engineer provided, however 1 had expired. Registration with required organisation expired on 31/8/22. Lifts – Qualifications for engineers and risk assessment provided. Minutes of last meeting held (10 Jan 24) provided. Proof of insurance, proof of registration and evidence of control checks not provided. Asbestos – Minutes from meetings and qualifications of engineer provided. Insurance evidence was out of date (2020) and registration with organisation, risk assessments and quality control checks were not provided. Gas - Minutes of meetings provided, qualifications of engineers provided. Gas safety registration provided. Copy of insurance policy had expired and no quality checks provided.

	Damp condensation and mould – evidence of qualifications and insurance supplied. Risk assessments and contractor minutes not provided. Fire safety contractor – insurance provided. Evidence of qualifications, risk assessments and contractor minutes not provided.
Action required:	a. To gather outstanding information including liaising with Procurement. b. To seek evidence of regard gas safety quality assurance checks completed within the last 3 months.

Site visits	
Exercise findings:	Amber
Scope of exercise:	Carry out site visits and obtain compliance information from accompanying surveyor or property services officer.
Outcome:	Sezanne Walk community centre • No asbestos management plan displayed • No poster displaying the responsible persons • Gerda box installed however missing contact numbers and responsible persons • PA Testing items – Microwave failed. Glen Haven sheltered housing flat scheme • Asbestos management plan displayed • No poster displaying the responsible persons • Gerda box installed and all contents present • PA Testing items – passed however expire July 24. 20 Carrington NSAP • Asbestos management plan only in Gerda box • Poster displaying the responsible persons • Gerda box installed and all contents present • PA Testing items – several items expired May 24. The Square, Spalding General needs flat scheme • No asbestos management plan displayed • No poster displaying the responsible persons • No Gerda box installed. Nene Court Guest Room • No asbestos management plan displayed • PA Testing items – passed.

2 Beech Avenue void

- 100% of evidence supplied.

Action required:
a. All community centres, flat schemes and guest rooms to be surveyed to ensure the relevant literature is displayed, and where applicable, Gerda boxes installed.
b. Programme of notice board checks to be established in community centres.

7. ACTION PLAN

7.1 Actions to be added to Housing Compliance Clinic action tracker.

Action	Recommendation	Priority	Officer Responsible	Due date
QS1	Produce a 'busy persons guide' recording where evidence is stored.	6 months	Housing Property and Repairs Manager	28/2/2025
QS2	Review access to contractor portals – check that there is sufficient access to the relevant portals by both the Property and Repairs Teams with no single points of failure	3 months	Housing Property and Repairs Manager	30/11/2024
QS3	Review corrupt fire risk assessment evidence files (approx. 8 photos corrupt within the 23/24 action folder).	1 month	Housing Property and Repairs Manager	30/9/2024
QS4	To source outstanding smoke detection testing/servicing records.	1 month	Housing Property and Repairs Manager	30/9/2024
QS5	To carry out an exercise focused specifically on testing records for installation of smoke detection systems in properties with storage heaters.	3 months	Housing Property and Repairs Manager	30/11/2024
QS6	Consider carrying out telephone exercise with tenants again to confirm receipt of gas safety certificates/adding telephone calls to sample audit checks.	6 months	Housing Property and Repairs Manager	28/2/2025

QS7	Draft a policy statement around approach to C3 electrical safety recommendations	6 months	Housing Property and Repairs Manager	28/2/2025
QS8	Review approach with Housing Delivery Team regarding filing of new build electrical safety certificates, including shared ownership.	6 months	Housing Property and Repairs Manager	28/2/2025
QS9	Contract review meeting to take place to ensure electrical safety certificates are issued to tenants, adopting the same process as gas safety. Due to the recent change in legislation, certificates held by the Council will not be issued retrospectively, however the website should be updated to advise tenants how they can obtain a copy of the certificate should they wish to do so.	3 months	Housing Property and Repairs Manager	30/11/2024
QS10	Damp, condensation and mould exercise to be carried out again.	3 months	Transformation Team	30/11/2024
QS11	Ensure exercise of transferring of liability of sewage discharge and treatment is completed.	1 month	Housing Property and Repairs Manager	30/9/2024
QS12	Risk register to be amended to reflect the situation pending switchover to new contractor. (Sewage contract).	1 month	Housing Property and Repairs Manager	30/9/2024
QS13	Upload evidence of transfer of liability for sewage discharge and treatment to the intranet.	1 month	Housing Property and Repairs Manager	30/9/2024
QS14	Property Services procedures to be dated and planned reviews programmed in	6 months	Housing Property and Repairs Manager	28/2/2025
QS15	Monitor themes and trends regarding repeat pull cord self-testing (due to no access)	6 months	Housing Services Manager	28/2/2025
QS16	Upload a copy of qualifications for Housing Repairs Team to the	6 months	Housing Property and Repairs Manager	28/2/2025

	intranet and ensure it is accessible			
QS17	To ensure all ladder checks are completed and there is a programme in place	1 month	Housing Property and Repairs Manager	30/9/2024
QS18	Ascertain situation regarding EPCs on green homes including progress regarding accessing properties where this is being refused. Outstanding EPCs to be sought.	3 months	Housing Property and Repairs Manager	30/11/2024
QS19	Conduct EPC exercise again.	3 months	Housing Transformation Team	30/11/2024
QS20	Survey all community centres, flat schemes and guest rooms to ensure the relevant literature is displayed on site, and where applicable, Gerda boxes installed.	3 months	Housing Services Manager	30/11/2024
QS21	Establish a programme of notice board checks in community centres to ensure required literature continues to be displayed and is kept up to date.	6 months	Housing Services Manager	28/2/2025
QS22	Collate outstanding contractor information.	1 month	Housing Property and Repairs Manager	30/9/2024
QS23	Gain evidence of gas safety quality safety checks completed within the last 3 months.	1 month	Housing Property and Repairs Manager	30/9/2024

ends