

<b>LONDON BOROUGH OF CAMDEN</b>	<b>WARDS:</b> All
<b>REPORT TITLE:</b> Performance on compliance Q4 2024/25	
<b>REPORT OF:</b> Director of Property Management	
<b>FOR SUBMISSION TO:</b> Housing Fire Safety & Building Safety Panel	<b>DATE:</b> 10 July 2025
<b>STRATEGIC CONTEXT</b> The Council is required by law to provide safe homes and places of work.	
<b>SUMMARY OF REPORT</b> This report provides an update on compliance across fire, legionella, asbestos, gas, electrics and lifts (FLAGEL) for the housing portfolio for Q4 2024/25. It also provides: <ul style="list-style-type: none"> <li>- Q4 performance on safety related Tenant Satisfaction Measures for 2024/25, which will be reported to the Regulator of Social Housing (RSH)</li> <li>- an update on the latest progress made to complete fire safety actions, and an update on delivery against the Voluntary Undertaking agreed with the RSH November 2023.</li> <li>- An update on Building Safety Case submissions</li> <li>- A note on the council's preparations in respect of Awaab's Law</li> </ul>	
<b>Local Government Act 1972 – Access to Information</b> No documents that require listing were used in the preparation of this report.	
<b>Contact Officer:</b> Sinéad Burke, Head of Property Asset Management <a href="mailto:Sinead.Burke@camden.gov.uk">Sinead.Burke@camden.gov.uk</a>	
<b>RECOMMENDATIONS</b> The Panel is asked to note and comment on: <ol style="list-style-type: none"> <li>1. Performance on compliance for Q4 2024/25, including year-end TSM figures</li> <li>2. Performance on the completion of remedial actions</li> <li>3. Latest position on fire safety actions</li> <li>4. Building Safety Case updates</li> <li>5. Preparations in respect of Awaab's Law</li> </ol>	

Signed   
Gavin Haynes, Director of Property Management

Date 1 July 2025

## 1. SUMMARY

- 1.1 This report covers the statutory safety compliance measures and best practice performance of the Council which apply to Council homes. This performance is monitored monthly by the Housing Regulatory Board chaired by the Executive Director of Supporting Communities and the report provides an overview of the Q4 compliance position in 2024/25 (detailed in Appendix 1).
- 1.2 The report also details the progress on delivering against the Voluntary Undertaking agreed with the RSH, and the latest on the delivery of Fire Risk Actions, the Q4 position on Tenant Satisfaction Measures related to safety and an update on the preparation of Building Safety Case files required for higher-risk buildings.

## 2. Q4 PERFORMANCE ON COMPLIANCE (including Tenant Satisfaction Measures (TSMs))

- 2.1 The Q4 2024/25 figures for the 5 safety TSMs are set out in the table below; these will be reported formally to the Regulator of Social Housing (RSH). The table also includes a draft TSM which the council calculates in respect of electrical checks. This is not reported formally to the RSH but is likely to become a TSM in the medium term.

TSM	Year End 23/24	Q3 24/25	Year End 24/25	Direction since Year End / Comment
BS01: Gas Safety Checks	98.97%	98.72%	<b>99.05%</b>	Up; action plan in place to resolve voids has now yielded improvements
BS02: Fire Safety Checks	99.57%	98.46%	<b>98.44%</b>	Down; there were some delays to planned FRAs at year end due to contract changeover
BS03: Asbestos Safety Checks	96.36%	99.67%	<b>99.90%</b>	Up; continued progress accessing street properties
BS04: Water Safety Checks	95.83%	99.99%	<b>99.93%</b>	Up; continued progress accessing street properties
BS05: Lift Safety Checks	75.67%	84.43%	<b>98.28%</b>	Up; back up contractor completed LOLERs. All HRBs had up to date LOLER at year end
DRAFT: Electrical Safety Checks	'TSM' analysis not available	90.17%	<b>91.33%</b>	Up; slow continued progress on remaining domestic electrical checks

- 2.2 **Gas safety checks:** Compliance for the council's communal systems remains at 100%. 99.14% of homes with individual gas boilers have had gas checks done in time; this is below previous quarters, and has been affected by some delays in obtaining court dates for access applications. Voids performance is up to 80.65% from 60% at Q3. The council has put in place an action plan on voids; key actions include appointing a contractor to complete checks on these properties and reviewing the correct recording of decommissioning certificates. This has now

yielded a significant improvement within Q4, and we expect that within Q1 of 25/26 the remaining re-inspections will be carried out.

- 2.3 **Fire risk assessments:** 98.44% of council-managed blocks had an up-to-date fire risk assessment at year end. This is down on usual monthly outturns. This has been due to a 2-week delay in mobilising a new contract with our assessment provider. We are working with our provider to make sure an improved position is returned as soon as possible. The TSM includes blocks where Camden is not responsible for completing the fire risk assessment but does own social homes; FRAs are only available for 44% of these homes, and the council now has an escalation plan in place.
- 2.4 **Asbestos checks:** 99.90% of homes have asbestos checks in place. This is a significant improvement from year-end 23/24 and is the result of ongoing efforts to ensure access is gained to street properties. This has been supported by a universal key programme for the communal doors to street properties, to ensure the council has access to these areas to carry out essential repairs and inspections.
- 2.5 **Water safety checks:** Compliance is at 99.93% on the TSM, representing one remaining block where the water risk assessment is required. As with the asbestos checks, this improvement since the year end 23/24 position is the result of improved access to street properties. Water servicing, however, remains an area of weakness; at Q4 performance was 64%. As of 1 June 2025, this service has moved to a new provider, who is a specialist contractor for water hygiene, and we anticipate this will improve this position. However, realistically, we expect this improvement to be seen by Q2 figures.
- 2.6 **Lift safety checks:** 98.94% of lifts had a LOLER check within the past 6 months, including all lifts to High Rise Buildings (HRBs). This represents just over 98% as a TSM; the TSM measures the % of homes where all associated lifts have their LOLER certs in date. This is a significant improvement on the previous year. The council maintains an internal working group of key officers to ensure this compliance area reaches 100%.
- 2.7 **Electrical safety checks:** 99.89% of communal electrical systems have an EICR carried out within the past 5 years. Progress on domestic electrical checks has increased as a new contractor has been appointed; this is now up to 93.49% against 90% at Q3. The council is also now using revised access letters, and these are assisting in overcoming some no-access challenges. We anticipate that electrical safety checks will be introduced as a formal TSM, and applying an assumed methodology are at over 91%%.
- 2.8 **Third Party Audit:** The Council has appointed an external auditor to carry out an audit of its FLAGEL compliance work. This is to ensure external assurance on our data and performance, to ensure the council is working to best practice industry approaches and offer additional insight on how we can improve performance further.

### 3. REMEDIAL WORKS (incl Lift Contractor Performance)

- 3.1 For each compliance area, there are arising remedial actions; these are the works identified as necessary as part of compliance tests. The council's reporting has slightly different approaches to recording these, and the table below provides some notes as well as comparison to recent performance.

Compliance Area	Year End 23/24	Q3 24/25	Year End 24/25	Comment on Metric
No. Overdue Fire Risk Actions	8,140	4,183	<b>3,286</b>	Position reported to RSH as at 26 March 2025.
No. Remedial Actions from Water Servicing	428	405	<b>225</b>	This is the total number of outstanding remedial actions.
No. Lifts with Overdue Lift Actions	11	1	<b>41</b>	This is the no. lifts with overdue remedial orders. Note the Council's target time of 3 months is more ambitious than the regulatory requirement of 6 months. The number increased at year end due to all the additional LOLER inspections commissioned.
No. Properties Electrical Remedials to Homes	344	362	<b>401</b>	Homes can have more than one observed fault. Urgent "Code 1" faults are addressed at the time of inspection.

- 3.2 **Gas and Asbestos:** There is no current KPI on remedials arising from these checks. Works to gas are done at the time of the servicing in line with gas regulations requirements. In exceptional circumstances this may require the gas to be capped pending works being completed. Asbestos works may give rise to encapsulation or removal works. A review will be undertaken if a KPI can be put in place for both compliance areas.
- 3.3 **Fire Risk Actions:** Progress on the completion of these is discussed in further detail in Section 4 of this report.
- 3.4 **Water:** This has been a weaker area of performance, which has been noted within the FLAGEL reporting in the lines on water servicing. There has been considerable progress in Q4, with the outstanding actions reduced by almost half. A new specialist provider (Sureserve) commenced on 1 June 2025. The contract has been set up as a specialist programme (rather than being part of a wider 'mechanical services' contract) with the intent of securing the services of a specialist contractor. While we anticipate the new contract will have a positive impact on the water hygiene performance, we expect that it will take some months for this to be fully realised. It is usual for contractors to take a few months to fully mobilise and gain familiarity with the council's stock and systems.
- 3.5 **Lifts:** The target for remedials for lifts is set at 3 months, where the regulatory requirement is 6 months. This means there are occasions when our records show a remedial action as being overdue, but it is not overdue in a regulatory sense. While most LOLER inspections are carried out via the Council's building insurance provider, remedial works are completed by APEX, and most works are done as part of monthly servicing work. The increase in remedial actions at year end is due to the increase in LOLER inspections done in Q4.

- 3.6 **Lift Contractor Performance (LOLER checks):** As noted above the council works with different providers. The LOLER inspections are mostly completed by Zurich via the council's building insurance policy. In the past year there has been considerable focus on understanding and responding to their access policies to ensure that they can access more lifts on a first visit to complete a LOLER inspection, and to agree steps for reinspection where works to enable access are required. The council did rely considerably on back up contractors in the 24/25 financial year to ensure the programme was up to date, so the performance of Zurich on repeat inspections will only be tested in full within this coming financial year.
- 3.7 **Lift Contractor Performance (Repairs and Planned Maintenance):** The Council robustly manages its contractor Apex in line with contract conditions and routinely escalates matters as appropriate with Directors. In recent months the Council has had interim engineering support, and this has helped it monitor the operation and maintenance of the Council's 570 lifts. We actively monitor lift outages and on 27 June we had 5 lifts out of the 570 out of service. All out of service lifts have actions assigned to either the Council or the contractor
- 3.8 **Lift Performance (Capital Investment):** The successful operation of a lift service is heavily dependent on the condition of the lifts, as this is the best way to avoid lift breakdowns happening in the first place. The Council has invested heavily in lift renewal in the past 15 years; over 80% of lifts are under 15 years old. The Council has a bespoke specification for its lifts which is tailored for heavy use in a social housing setting. The existing lift replacement programme has been developed based on age, breakdown history and frequency of need for replacement parts. They have then been prioritised based on the type of block and how many lifts are available within the block. The asset strategy, as approved by Cabinet in January 2025 will see 50 to 55 lifts replaced over the next 5 – 7 years. The Council has also kept infrastructure up to date – for example the alarm “autodiallers” are now fully digital and are remotely monitored.
- 3.9 **Electrics:** During Q4 a new contractor has been appointed to carry out EICRs and remedial actions for dwelling electrics; however, there was a dip in performance in moving across. By year end the EICR figure had recovered, but the remedials figure is still down. It is expected that both will show improvement within Q1 of 2025/26.

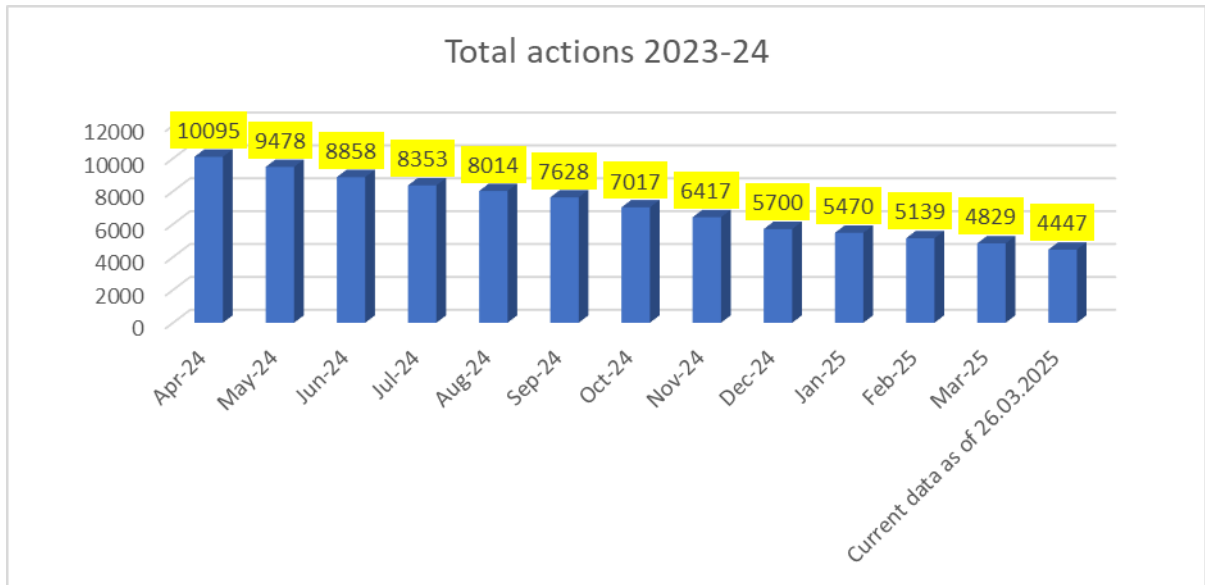
#### 4. VOLUNTARY UNDERTAKING (VU)

- 4.1 The Voluntary Undertaking with the RSH requires the Council to deliver an Action Plan and complete all outstanding FRA actions by the end of 2025. As at 26 March 2025, there are no high-risk actions remaining. However, there were two recorded in the quarter; On 1 March there were two high-risk actions related to faults on communal alarm systems which went overdue for a few days. These are occurring more frequently as the Council installs more panel systems. Delays usually relate to faults on detectors within dwellings.



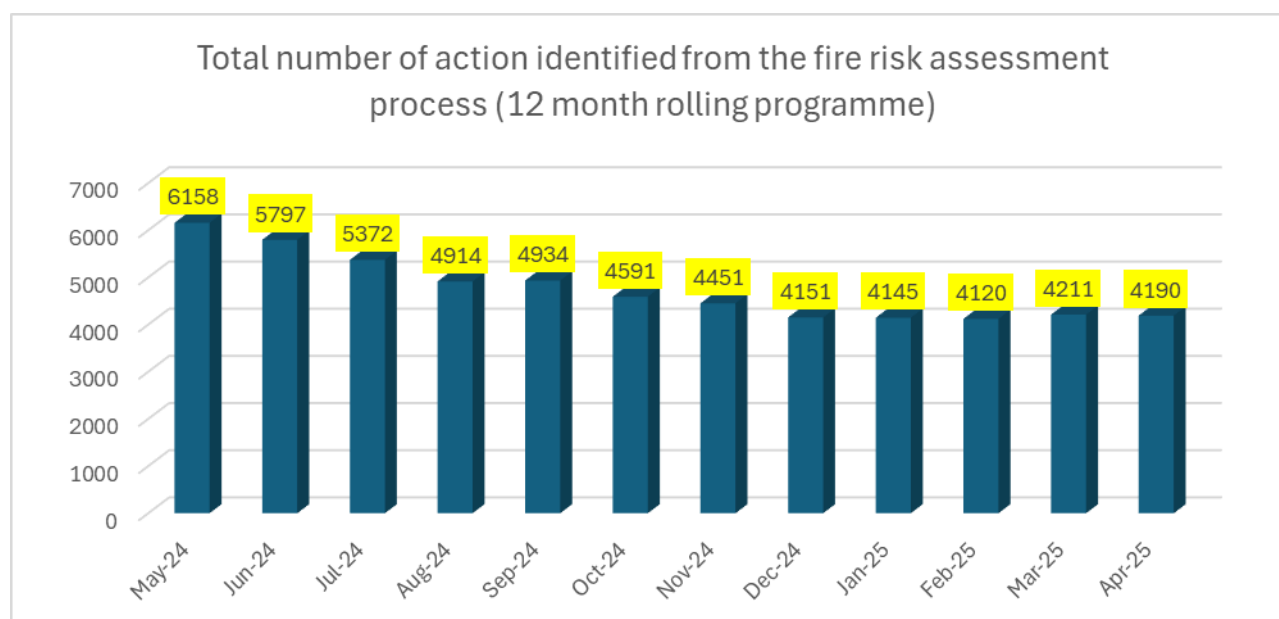
4.2 The number of outstanding medium and low risk actions is steadily decreasing: At 26th March there were 2,720 medium risk and 1,727 low risk actions to be delivered, giving 4,447 in total. This is down from 11,095 in April 2024. Of the remaining 4,447 actions, 3,286 were overdue. The council is working to complete this programme of overdue actions by December 2025. Our monthly reports are published here:

[Fire risk assessments for Camden housing - Camden Council](#)



4.3 The VU was issued in respect of overdue actions which accrued following the cycle of FRAs undertaken post 2017, and the VU commitment is to clear all overdue actions. The reality of a large portfolio like Camden's is that there will always be an amount which are underway. In the past few months, the programme has reached an important threshold between 'catch up' and BAU. The number of new actions in the last 12 months has finally stabilised at a bit over 4,000 actions and this allows officers to plan effective long-term processes and resource. Considering the council carries out about 1,500 FRAs per year this represents only 3 actions per FRA and is

to be expected. In general, these newer actions are more likely to be low risk (from c.20% of new actions in early 2023 to c.33% of new actions now) and a smaller percentage (<10%) requiring capital works. Most relate to ongoing repairs, alarm panel faults and day-to-day management of the block.



4.4 **Carbon Dioxide and Smoke Alarms:** 100% of homes with a gas boiler have a carbon monoxide alarm. Progress is continuing slowly on smoke alarms; the council is investigating escalated access options. The second table shows the status of this programme going back several quarters to illustrate progress.

**Q4 24/25**

Gas Assets / Solid Fuel	CO Alarms	Residential Homes	Smoke Detectors	In Packet for Delivery	NO ACCESS
Number	Number	Number	Number	Number	Number
13,067	13,067	22,219	21,107	409	703
	100.00%		95.00%	1.84%	3.16%

Quarter	CO Alarms	Smoke Detectors (% installed)	Smoke Detectors (In packet for delivery)	Smoke Detectors (No access)
Q1 24/25	99.98%	93.58%	2.57%	3.86%
Q2 24/25	99.99%	93.75%	2.28%	3.97%
Q3 24/25	100.00%	94.95%	1.85%	3.20%
Q4 24/25	100.00%	95.00%	1.84%	3.16%

**5. BUILDING SAFETY CASE SUBMISSIONS**

5.1 At the time of writing the council has received two Building Assessment Certificates (BACs) for high-rise Buildings from the Building Safety Regulator. The BACs are for two blocks in the Amphill Square estate, 1-80 Gillfoot and 1-80 Dalehead. The certificates have been placed on

the Building Safety notice boards in each block and published on the council website ([Registered high-rise residential buildings in Camden - Camden Council](#)), and certify that at the time of issues the Regulator is satisfied that the submitted Building Safety Case File (BSCF) adequately demonstrates that the building is built, maintained and managed in a way that is safe for residents.

5.2 The Building Safety Regulator has formally revised their programme for requesting BSCFs; instead of the 37 planned for 2024/25 and another 37 for 2025/26 they now plan to request 12 and 15 respectively. The revised profile is presented in the table below. Note that the Building Safety Regulator reserves the right to call in the BSCF for any HRB at any time. The team continue to develop draft BSCFs so that they are steadily produced over the 5 years; a tracker is in place. All tranche 1 BSCs have been submitted but at the time of writing the Building Safety Regulator has yet to call any additional submissions.

Tranche	1 (24/25)	2 (25/26)	3 (26/27)	4 (27/28)	5 (28/29)
Original Programme	37	37	38	38	38
Revised Programme	12 (all submitted)	15	18	22	121

5.3 The table below summarises the status of Building Safety Case Files (BSCF):

High Rise Buildings (HRBs)		
Item	No.	Definition
Building Safety Case Reports – Advance Notice	0	The BSR provides notice in advance of ‘calling in’ a Building Safety Case File.
Building Safety Case Reports – Submitted	12	These have been submitted for review by the BSR. In some cases, the Council has been asked to provide additional details and clarifications.
Building Assessment Certificates Issued	2	This Certificate is valid for 5 years.

## 6 AWAAB’S LAW

6.1 On 6 February the Government announced that Awaab’s Law will be brought into effect in October 2025. [Awaab’s Law to force landlords to fix dangerous homes - GOV.UK](#). The release notes that: From October, social landlords will be forced to investigate and fix dangerous damp and mould in set time periods, as well as repair all emergency hazards within 24 hours.

6.2 On 25 June the Government published draft guidance on the upcoming regulation which is to be implemented from 27 October 2025. That draft guidance is available here: [Awaab’s Law: Draft guidance for social landlords - GOV.UK](#). It provides some detailed discussion on the scope of the regulation, timelines for a landlord to respond to emergency repairs and significant hazards, sets out specific requirements for how a landlord should communicate with a tenant, and outlines transitional arrangements and enforcement action.



6.3 The guidance (at link above) provides the following summary in respect of the upcoming legislation and a process flowchart:

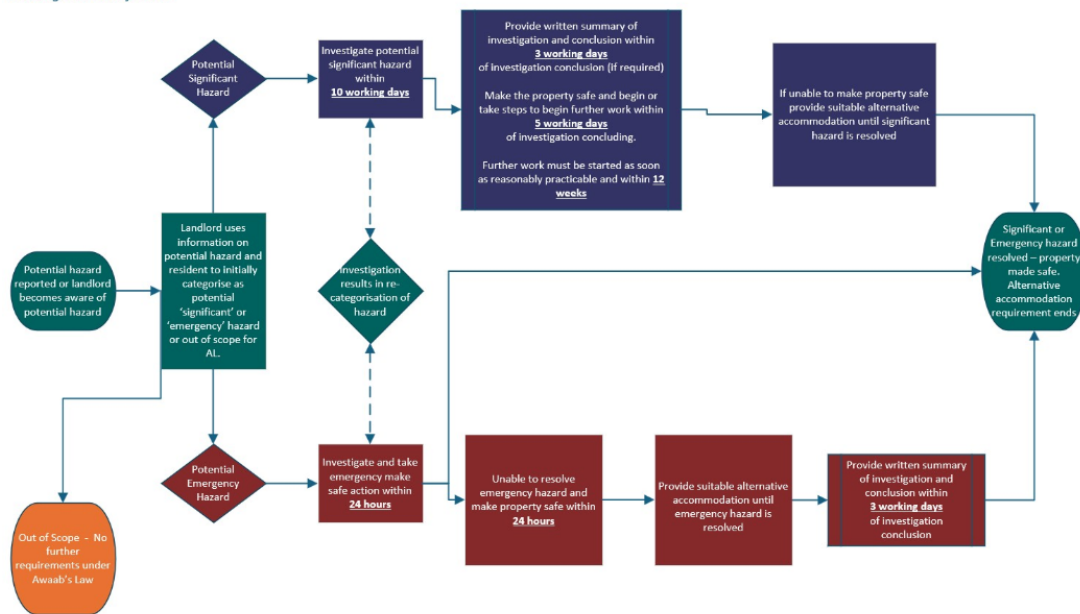
1.4 *The Regulations mean landlords must:*

- *investigate any potential emergency hazards and, if the investigation confirms emergency hazards, undertake relevant safety work as soon as reasonably practicable, both within 24 hours of becoming aware of them*
- *investigate any potential significant hazards within **10 working days** of becoming aware of them*
- *produce a written summary of investigation findings and provide this to the named tenant within **3 working days** of the conclusion of the investigation*
- *undertake relevant safety work within **5 working days** of the investigation concluding, if the investigation identifies a significant hazard*
- *begin, or take steps to begin, any further required works within **5 working days** of the investigation concluding, if the investigation identifies a significant or emergency hazard. If steps cannot be taken to begin work in **5 working days** this must be done as soon as possible, and work must be physically started **within 12 weeks***
- *satisfactorily complete works within a reasonable time period*
- *secure the provision of suitable alternative accommodation for the household, at the social landlord's expense, if relevant safety work cannot be completed within specified timeframes*
- *keep the named tenant updated throughout the process and provide information on how to keep safe*

*Upon becoming aware of a potential hazard, social landlords should use all available information to initially determine if the hazard is a potential significant or emergency hazard and take steps to complete relevant safety work within stated timeframes.*

*Under Awaab's Law, social landlords have a defence if they have taken all reasonable steps to comply with the requirements but have been unable to comply for reasons beyond their control (Section 10A(5) of the Landlord and Tenant Act 1985).*

Diagram 1 - Awaab's Law Process Flow  
 Note : Does not include, renewed and further investigation timeframes



- 6.4 The council has formed an internal working group to prepare for the introduction of Awaab's Law regulations in October 2025. This includes consideration of all 29 hazards under the Housing Health and Safety Rating System (HHSRS); this includes damp and mould. A review of the council's controls in respect of all of these has been undertaken, and staff training has been organised to refresh staff awareness of these.
- 6.5 The aim of the working group is work in a proactive way to avoid damp and mould issues arising in the first place, and to ensure that suitable and sustainable funding arrangements are in place.
- 6.6 In 2024 the council began an internal stock condition survey which ~~when~~ will be completed in autumn 2026, will ensure the council has specific survey data on all tenanted homes. This survey includes a condition survey and a HHSRS. As of March, from 3,046 surveys carried out in the previous 6 months, 15 identified a Category 1 hazard, and of these 10 related to Damp and Mould. These are being referred to relevant teams to action. Progress is reported quarterly to the Housing Safety and Regulatory Board.

## 7. CONCLUSION

- 7.1 There is strong governance in place for the monitoring of compliance and performance is strong or has improved in several areas. Actions are being tracked and issues highlighted in these reports are being logged and tracked.
- 7.2 In Q1, the key areas of focus will be on preparation for regulation on Awaab's Law, building control gateway applications which are required to complete some FRA actions in high rise buildings, and full mobilisation of new M&E contractors on water hygiene, fire safety equipment and electrical testing. There will be continued work on Building Safety Case Files, completion of FRA actions and day to day compliance regimes.

## **8 RECOMMENDATIONS**

8.1 The Panel is asked to note and comment on:

1. Performance on compliance for Q4 2024/25, including year-end TSM figures
2. Performance on the completion of remedial actions
3. Latest position on fire safety actions
4. Progress on Building Safety Case submissions
5. Preparations in respect of Awaab's Law

## **9.0 COMMENTS OF THE BOROUGH SOLICITOR**

9.1 On 1<sup>st</sup> April 2023 the Government 's requirements for Tenant Satisfaction Measures come into force and landlords start collecting data for tenant satisfaction measures. The Tenant Satisfaction Measures are intended to make landlords' performance more visible to tenants, and help tenants hold their landlords to account. This report confirms the Q4 figures for 2024/25 figures for the 5 safety TSMs.

9.2 In 2023 the Council was served with a regulatory notice by the Social Housing Regulator. The notice was related to the number of fire risk assessment actions that were outstanding at Camden council homes. In Autumn 2023 Camden entered into a Voluntary Undertaking (VU) with the Regulator for the monitoring and completion of the outstanding FRA actions. This report details the status of actions in relation to that undertaking and confirms that as at 26 March 2025, there are no high-risk actions remaining.

9.3 Awaab's Law comes into force on 27 October 2025. This legislation requires social landlords to fix reported damp, mould and emergency repairs within strict timeframes.

## **10. COMMENTS OF THE EXECUTIVE DIRECTOR OF CORPORATE SERVICES**

10.1 The purpose of this report is to provide an update on the following items: compliance across FLAGEL for the housing portfolio for Q4 2024/25, progress on fire safety actions, delivery against Voluntary Undertaking, Q4 performance for TSM for 2024/25, update on the Building Safety Case File submissions and preparations in respect of Awaab's Law. There are currently no financial implications arising from this report.

10.2 Finance will work with the service to monitor and ensure as much as possible that associated costs are funded from existing resources

## **12.0 ENVIRONMENTAL IMPLICATIONS**

12.1 There are none.

Appendix 1 – Performance on Compliance (Housing) Q4 2024/25

<b>FLAGEL Dashboard All Assets - 2024/25</b>					
	<b>Measure</b>	<b>Position Close Q2 2024'25</b>	<b>Position Close Q3 2024'25</b>	<b>Position Close Q4 2024'25</b>	<b>RAG</b>
<b>Fire</b>	% of FRA Surveys Completed	95.96%	99.19%	99.04%	<b>Amber</b>
		3231/3367	3286/3313	3285/3317	
<b>Gas</b>	% of Domestic Gas Safe Certificates Issued	97.95%	97.81%	98.42%	<b>Amber</b>
		13357/13637	13001/13292	13295/13509	
	% of Comm Boilers Serviced Within 12 months of last service	100.00%	100.00%	100.00%	<b>Green</b>
		158/158	160/160	162/162	
<b>Electrical</b>	% of Properties with Domestic EICR Certificates Issued in the last 5 years (New 5 Year Cycle)	90.00%	90.60%	93.49%	<b>Amber</b>
		21026/23362	21049/23232	21738/23251	
	% of Communal EICR Certificates issued in the last 5 years	99.89%	99.61%	99.82%	<b>Amber</b>
		2826/2829	2818/2829	2822/2827	
<b>Lifts</b>	% of lifts serviced to schedule	57.09%	94.68%	97.88%	<b>Amber</b>
		322/564	534/564	553/565	
	% LOLER Insurance Certificates issued	88.45%	92.73%	98.94%	<b>Amber</b>
		498/563	523/564	558/564	
<b>Asbestos</b>	Number of blocks with asbestos surveys to communal areas (reg 4)	100%	100%	100%	<b>Green</b>
		3852/3852	3852/3852	3852/3852	
<b>Water Hygiene</b>	Class A - Water Risk Assessment (Stored Hot Water Site)	100%	100.00%	100%	<b>Green</b>
		43/43	43/43	43/43	
	Class B - Water Risk Assessment Larger Domestic Properties - (Individual Risk Assessment)	100.00%	100.00%	100.00%	<b>Green</b>
		47/47	47/47	47/47	
	Class C - Water Risk Assessment Lower Risk Domestic Properties - (Scattered Properties)	99.35%	100.00%	99.78%	<b>Amber</b>
		461/464	464/464	464/465	
	Class D - Water Risk Assessment (Street Properties)	98.62%	99.66%	100.00%	<b>Green</b>
		286/290	289/290	290/290	
	Total % Compliance of WRA	99.17%	99.88%	99.88%	<b>Amber</b>
		837/844	843/844	844/845	
Water Tanks - 6 Monthly Servicing Regime	86.56%	70.17%	65.29%	<b>Red</b>	
	734/848	595/848	553/847		
% of Water Hygiene Testing Completed	91%	100.00%	90.28%	<b>Amber</b>	
	64/70	70/70	65/72		

ENDS