

Addendum to objection of accounts regarding the Bristol City Council Housing Transformation Programme with associated questions to the Auditor

Dan Ackroyd - 16 March 2026

This document provides additional factual and contextual detail in support of the objection¹ to the accounts of Bristol City Council in relation to the establishment and operation of the Housing Transformation Programme (also referred to as the Housing and Consumer Standards Programme), including the governance framework under which the programme was approved and implemented.

The document sets out information that has emerged since my objection to the accounts was submitted and includes a series of numbered questions. These questions arise directly from the matters described and are intended to assist the auditor in determining whether the programme was established and conducted lawfully.

1. Background and analysis of BCC Risk assessments and consequent questions

Bristol City Council operates a 'risk register' with a scoring system. The scoring system has two parts; a likelihood rating, with scores of 1-4 and an impact rating with scores of 1, 3, 5 or 7. See appendix 1 for full details, but here are the details for choosing between likelihood '3' and '4'.

| Likelihood | Description | Numerical Likelihood |
|------------|--|----------------------|
| 3 | Will probably happen, possibly at regular intervals. | 50% or more |
| 4 | Likely to happen, possibly frequently. | 75% or more |

The 'likelihood' score is multiplied by the 'impact' score to give a total score. Risks with a total score of 21 or lower can be managed at the directorate level. Risks with a score of 28 were meant to be published and discussed at the appropriate committee meeting. Risks with a score of 21 or lower can be "managed at the directorate level".

The two risks related to my objection to the Housing Transformation programme are:

- CRR52 Failure to manage and evidence compliance with the Building Safety Act 2022 obligations in HRA stock leading to injury and or regulatory enforcement.
- CRR60 - Failure of HRA stock to meet landlord statutory obligations, the decent homes standard and consumer standards leading to death / serious injury and/or regulatory enforcement action.

¹ "Formal Objection under Local Audit and Accountability Act 2014 – Housing Transformation Programme and Related Expenditure" made on 6 Aug 2025

Neither of these risks were disclosed to the public or any committee before the elections on 2 May 2024.

I made an FOI request for the [Audit trail for risks related to Fire/building safety](#)². Those logs indicate in a few places that officers did evaluate the risk score as 28 on multiple occasions, but then the scores were adjusted back down.

For risk CRR52 this happened once before the Barton House evacuation, where the executive director scored it as 28, but then the Director of Housing, and the Cabinet member for Housing adjusted it back down.

| | | |
|------------|----|---|
| 05/10/2023 | 21 | After guidance from Director of Housing and Cabinet member for housing; updated internal controls and actions to be more reflective of current position, resulting in current risk profile being considered to be mitigated to reduce risk to 21. there remains to be significant challenges to be overcome to become compliant to the building and fire safety acts, but actions are recorded and visible |
| 11/09/2023 | 28 | Conversation at DMT and with John Smith to highlight buildings safety risk as its own specific risk to ensure suitable governance and visibility as we track through mitigations |

This looks like clear political interference to prevent it from becoming public knowledge.

Somewhat astoundingly, the risk CRR 52 was kept at score 21, even after the lack of preparation had caused the evacuation of Barton House.

On the 30th November 2023, there were multiple updates to the risk register on the same day. It is hard to understand exactly what happened, as the order of the three updates is not provided, but it seems bizarre to me that an evacuation triggered by non-compliance with the Building Safety obligations was treated as anything other than a 100% chance of happening, as it had already happened.

| | | | |
|------------|----|--|---|
| 30/11/2023 | 21 | The panel determined that the likelihood should increase to 4 (highly likely) to reflect the above concerns, and takes into consideration the current major incident declared at Barton House relating to structural issues. Following discussion with members of HSLT, the risk title has been amended to reflect the possible outcome of regulatory enforcement, and the likelihood of this reclassified as 3 (likely). Significant progress has been in resourcing the Building Safety Team - albeit still predominantly with Interim appointments, and a programme for prioritisation of delivery and management of our Building Safety Obligations. | (User/Role Deleted ie Author has left Council) |
| 30/11/2023 | 21 | The panel determined that the likelihood should increase to 4 (highly likely) to reflect the above concerns, and takes into consideration the current major incident declared at Barton House relating to structural issues. Following discussion with members of HSLT, the risk title has been amended to reflect the possible outcome of regulatory enforcement, and the likelihood of this reclassified as 3 (likely). | (User/Role Deleted ie Author has left Council) |
| 30/11/2023 | 21 | Significant progress has been made since last update. Registration of all high risk buildings in accordance with statutory obligations, development and implementation of key policies such fire safety, resident engagement and increased internal governance throughout all levels of the council. including CLB. | (User/Role Deleted ie Author has left Council) |

Question 1.1) How is it possible that a 'risk' that the council is not ready for the Fire Safety laws that were introduced in September 2023 was judged as anything other than a 100% risk, when it has already led to the emergency evacuation of a building?

Also, in the Audit Trail for Risk are entries for "DRR17b Electrical safety - Failure to manage and evidence compliance with electrical safety obligations in HRA stock may lead to regulatory enforcement, death, or serious injury."

² https://www.whatdotheyknow.com/request/audit_trail_for_risks_related_to

| | | |
|------------|----|--|
| 29/08/2023 | 21 | The risk rating was previously 28 in March 23 but due to an action plan being in place and the expectation that new contractual arrangements and processes would result in an improvement, scoring of 21 was agreed in May 23. Compliance is currently only 87.1%, and other Landlords in this position have self-referred to the Regulator of Social Housing. An action plan is in place to drive forwards improvement and we expect to see a progressive improving trend. New imminent contractual arrangements are expected to accelerate an increase in performance, and if performance is not considerably improved by January, further consideration will be made regarding self-referral as per decision at CMB 1/8/23. The 616 outstanding remedial actions is a key risk and requires resource to address these. Ongoing data issues are being identified. Risk score retained at 21 on the basis that whilst a lot of work has been completed, a high risk remains due to the reasons outlined above. |
| 24/08/2023 | 21 | (None) |
| 25/03/2023 | 21 | The risk remains high as 13.8% of properties do not have a valid electrical test certificate The score has been reduced as there is an action plan in place to address this, with clear activity and responsible leads identified However at the Q2 review the risk level should be increased if there is not a measurable and significant increase improvement in performance and consideration should be given to self-referral. |
| 01/03/2023 | 28 | Current performance: Domestic electric safety performance is at 85% currently with 15% overdue Communal electric safety performance is at 97.96% Target is 99% for domestic and 100% for communal Actions to improve performance: Action plan and internal controls are in place. Legal processes for no accesses are under review. Litigation officer will be commencing 6.3.23 to ensure injunction process commence process following 3rd no access letter. New procurement framework will enable an increase to 400 tests per month. Policy is being finalised and supporting procedures are in development. Ongoing work to validate accuracy of data and evidence of electrical testing. |

It would have been clear by late 2023, that the council had no chance of being compliant with the law on electrical safety checks.

And as it stands as of 17 Feb 2026 ["One in three council homes in Bristol are overdue having an electrical safety test carried out."](#)³

Additionally the council had zero chance of meeting the required standards on damp and mould.

The Council knew that a new regulatory regime was being introduced on 1 April 2024. The council also knew that there was no chance it would be compliant in time, and so started planning a self-referral to the Regulator of Social Housing. The document "foi_5a LetterFromBCC To RSH.pdf" lists the planned work that BCC needed to do to become compliant.

Just drafting that document represents months of work.

Question 1.2) If the Council is spending time and money on preparing a self-referral, how is that not a risk that has materialised, and has a 100% chance of happening because it has already occurred?

Please note, a [follow up FOI request](#)⁴ for the "guidance given by the Director of Housing and the Cabinet member for housing mentioned in the 05/10/2023 update" was refused on the grounds that *"It is important that a safe space exists to enable officers and members to exchange full and frank views in relation to sensitive subject matters."*

2. The response of the Chief Executive Officer leaves unanswered questions

On 9 October 2025 Nick Hibberd, the Chief Executive Officer replied to my emails of 29 and 30 July 2025, laying out the council's position on various aspects of how the Housing and Consumer Standards programme was established. See document "Email from BCC CEO regarding lawfulness of decision making.pdf".

³ <https://www.bristolpost.co.uk/news/bristol-news/one-three-council-homes-bristol-10818186>

⁴ https://www.whatdotheyknow.com/request/audit_trail_for_risks_follow_up

I am going to quote from that response, and point out the unanswered questions.

Sometimes urgent key decisions will be taken by officers and reported to the next available committee. The Council also has a Scheme of Delegation for Officers which is essential for the day-to-day operational management of the Council. In terms of the publication of decisions, we publish decision records following policy committee meetings and officer decision notices.

Question 2.1) Why was no officer decision notice or other formal published record made available for the 9 April 2024 decision to establish the Housing and Consumer Standards Programme? If such a record exists, please provide its reference, publication date, and location (or explain why it was not required to be published under the council's Constitution or access to information rules).

Question 2.2) Under which specific delegated power (from the Scheme of Delegation to Officers, as set out in the council's Constitution) was the decision to establish the Housing Consumer Standards Programme taken on 9 April 2024? Please provide the relevant section/reference from the Scheme of Delegation and any supporting documentation.

The decision to establish the Housing and Consumer Standards Programme was a management decision and was made at a meeting of the Corporate Leadership Board on 9th April 2024. It was not deemed to be a key decision as the establishment of the programme did not incur spend over the key decision threshold and would also not have a significant effect on two or more wards in the city.

Question 2.3) This is a city wide program that affects every ward where Council housing exists. How on earth does that not have a significant effect on two or more wards?

3. Background and questions regarding failures of compliance and the deployment of the C365 compliance IT System.

Bristol City Council was unprepared for the Fire Safety laws coming into effect in late 2023. It did not have an adequate IT system in place to store Fire Safety information related to Council homes.

Bristol City Council appears to have carried out a procurement process for a "[Property Compliance Management System \(Fire risk assessment\)](#)"⁵, which resulted in a system called "C365" or "C365Cloud" being deployed in early 2024 under the Mayoral administration, before the May 2024 elections.

*Description: Property compliance management system within BCC. Fire risk assessment
Awarded date: 9 February 2024
Contract start date: 1 March 2024*

5

<https://www.contractsfinder.service.gov.uk/notice/1205fd2c-3211-44a9-bc99-0ea024dc3e40?origin=SearchResults&p=1>

Value of contract: £162,000

Deployment of this compliance software is Included in the self-referral to the Regulator of Social Housing, in Workstream 1 under 'Dedicated Compliance IT System' as "Implement a dedicated Fire Risk compliance system." with a delivery target of 11th May 2024.

Reports presented by Officers have consistently omitted dates for when systems have been deployed. The language they have used has suggested that the C365 software had been deployed 'recently'.

From the [20/01/2026 Strategy and Resource committee](#)⁶ meeting: "*The new NEC and C365 (specialist compliance management & reporting system) were implemented at the end of October 25 and will provide enhanced compliance reporting for Q3 25/26.*"

Presented at the 19/12/2025 Homes and Housing policy committee, the [Savills: Milestone 1 Completion Position Statement](#)⁷ says: "*While NEC provides significant improvements, it does have limitations. To address these, BCC has opted to implement the specialist C365 system for health and safety management. This represents a clear improvement over the previous multi-system and spreadsheet-based approach. The C365 system has successfully gone live, however some issues have been identified that require resolution.*"

Under the Local Government Act 1972, reports to Cabinet and committees must contain sufficient information to enable members to properly discharge their functions. The omission or lack of clarity as to when a compliance system was procured and deployed is relevant where that information bears on the existence and management of identified risks.

In addition, governance and standards arrangements under the Localism Act 2011 require openness and accuracy in reporting material facts. The questions set out below are intended to assist in determining whether these duties were met in relation to the matters described.

Question 3.1) **Does purchasing this C365 compliance management system represent spending to mitigate CRR52?**

Question 3.2) **If BCC was required to spend money on a new compliance management system to manage the CRR52, how is that not a "materialised" risk - aka something that has already happened.**

At Full Council on 10 March 2026 I asked how the decision to purchase this software was made, and received this response:

"The contract was awarded through the G-Cloud 13 framework which is a Crown Commercial Services procurement framework for purchasing IT systems and software. The total cost includes the compliance system set up as well as the subscription fee.

The contract was accommodated within an established budget which was included in the 2023/24 budget approved by Full Council. The contract is below £500K so did

⁶ <https://democracy.bristol.gov.uk/mgConvert2PDF.aspx?ID=121527>

⁷

<https://democracy.bristol.gov.uk/documents/s120545/Appendix%20Aii%20-%20Milestone%201%20Completion%20Position%20Statement.pdf>

not require a key-decision. The contract authorisation was given by the Executive Director of Growth and Regeneration in line with established delegations."

Question 3.3) **Where was the decision to purchase this software published? If it wasn't published, is that a breach of the Openness of Local Government Bodies Regulations 2014 and/or the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012?**

Question 3.4) **If the C365 system was deployed with a delivery target of 11th May 2024, under the previous administration, how is describing it in 2025 as a "new" system not deception?**

4. Background regarding the laws on consulting tenants and questions as to whether those Laws were complied with.

[Section 105 \(1\) of the Housing Act 1985](#)⁸ says "A landlord authority shall maintain such arrangements as it considers appropriate to enable those of its secure tenants ...who are likely to be substantially affected by a matter of housing management to which this section applies...and the authority shall, before making any decision on the matter, consider any representations made to it in accordance with those arrangements."

Section 105 (5) of that act says "A landlord authority shall publish details of the arrangements which it makes under this section, and a copy of the documents published under this subsection shall (a)be made available at the authority's principal office for inspection at all reasonable hours, without charge, by members of the public, and (b)be given, on payment of a reasonable fee, to any member of the public who asks for one."

[Section 137 \(2\) of the Housing Act 1996](#)⁹ says "The authority or trust shall maintain such arrangements as it considers appropriate to enable those of its introductory tenants who are likely to be substantially affected by a relevant matter of housing management ...and the authority or trust shall, before making a decision on the matter, consider any representations made to it in accordance with those arrangements".

Section 137 (6) of that act says "The authority or trust shall publish details of the arrangements which it makes under this section, and a copy of the documents published under this subsection shall ...be made available at its principal office for inspection at all reasonable hours, without charge, by members of the public,"

At the last Homes and Housing committee on 13 February 2026, I asked where the council has published the "statement of arrangements" as a supplementary question. I have not received an answer as of 1 March 2026, which leads me to believe the Council has still not published a "statement of arrangements".

From the response provided by Nick Hibberd: "*The establishment of the Programme in itself was not something that triggered the consultation provisions in section 137 of the Housing Act 1996 or section 105 of the Housing Act 1985. The consultation requirements under these provisions relate to consultation with introductory and secure tenants on matters of housing management i.e. consultation with tenants who may be substantially affected by proposals related to the management, improvement, maintenance, or demolition of their homes, or the provision of services or amenities.*

⁸ <https://www.legislation.gov.uk/ukpga/1985/68/section/105>

⁹ <https://www.legislation.gov.uk/ukpga/1996/52/section/137>

However, as the programme is implemented and progresses, there may be changes or workstreams that are proposed that require consultation and this will take place as required."

Question 4.1) **What criteria or evidence supported the council's view that these decisions would not substantially affect secure/introductory tenants in housing management, improvement, maintenance, or services?**

Question 4.2) **Were any documented legal or governance assessments produced to justify non-consultation?**

Question 4.3) **Does the lack of consultation raise concerns about the transparency, propriety, or value for money of HRA spending and prioritisation in 2024/25?**

Question 4.4) **Where has Bristol City Council published a "Statement of Arrangements" (for both the Housing Act 1985 and Housing Act 1996) setting out how it will consult secure and introductory tenants on matters of housing management?**

I have just received a response to a supplementary question trying to locate the Statement of Arrangements: "*Bristol City Council does publish its arrangements for consulting tenants, but not under a single document explicitly titled "Statement of Arrangements for Consulting Tenants." Instead, the arrangements are set out across published policies, service standards, and tenant participation pages on the council website.*"

This does not appear to be compliant with the law. It also means that it is difficult to see if Bristol Council has followed its own policies.

5. Background regarding the failure to state the required funding for the Housing Transformation Programme and associated questions.

The position of the Council is that the Housing and Consumer Standards program would cost less than £500k, and so did not reach the threshold for a key decision.

As the decision was not published, and an FOI request for details of [the decision has been refused](#)¹⁰ it is not possible to say how this figure was calculated.

The scale of the spending needed would have been known during the self-referral on 15th April 2024.

In the self-referral letter to the Regulator of Social Housing "5a LetterFromBCC To RSH.pdf" there is a list of activities and delivery target dates (mostly in 2024) for the work to be done, and additional resources that Bristol City Council was allocating to the Housing Transformation Programme.

The list of resources appears to be at least 35 employees, plus additional outside contractors.

The Delivery Target dates appear to be ludicrously optimistic. The following is a selection of the target dates, with evidence taken from the reports presented to the Homes and Housing committee, that demonstrate that tasks that were estimated to take less than three months, took many times that amount of time, and some are still ongoing.

¹⁰ http://whatdotheyknow.com/request/decision_to_setup_housing_and_co

The following list compares the initial target dates with information taken from progress reports presented to the Homes and Housing Committee.

Delivery of smoke and CO detection inspections - 28 June 2024

"The smoke detection certificates requiring manual uploading are being input into the new IT system and this will be completed by mid. February 26." - Page 12, "Landlord Compliance Performance Report - December 2025.pdf"

"As at the end of December (2025) reporting period, there were 7,538 homes which did not have a compliant smoke alarm installed." - Page 12, "Landlord Compliance Performance Report - December 2025.pdf"

Delivery of Damp & Mould remedial works backlog - 28 June 2024

"The outstanding backlog of damp and mould cases has reduced from 1,972 at the time of the self-referral in April 2024 to 1,400." - Page 13, "Landlord Compliance Performance Report - August 2024.pdf", end of June 2024 position.

"The outstanding backlog of damp and mould cases reported at the self-referral in April 2024 was 1972 cases. Further data review has identified circa 3400 damp cases. It is currently not known how many of these relate to a backlog. This figure doesn't currently include new damp and mould cases identified through the new stock condition survey. The figure presented is an estimation across various data sources." - Page 9, "Landlord Compliance Performance Report - Sept 2024.pdf", mid-September 2024 position.

After this, the backlog position appears to have stopped being reported.

Delivery of outstanding electrical remedial works - 31 July 2024

"The number of backlog electrical remedial actions reported in self-referral was 546 an additional 188 outstanding remedial actions were identified through a data review exercise making the revised total 734. Contractors have undertaken 353 remedial orders making the current outstanding actions as 381." - Page 3, "Landlord Compliance Performance Report - Sept 2024.pdf", mid-September 2024 position.

Delivery of Electrical inspections properties with tests known to be over 10 years old - March 25

"At time of report there were 3002 domestic assets that did not have a compliant electrical safety certificate dated within the last 10 years" - Page 6, "Landlord Compliance Performance Report - September 2025.pdf"

Delivery of Fire Risk Assessments actions - 15 July 2024

"The number of open overdue medium risk fire remedial actions have decreased from 1,525 to 1,457, a reduction of 68." - Page 10, "Landlord Compliance Performance Report - December 2025.pdf"

The installation of Fire doors seems to be going particularly slowly.

| | | | | |
|-------|--|-------|-------|--------|
| 1.16a | Fire door replacements - Priority 1: February 2026 Install 95 fire doors to standard construction blocks - Priority 2: April 2026 Install 60 fire doors to non-standard blocks | 42.9% | 10.3% | -32.5% |
|-------|--|-------|-------|--------|

The table columns are, Reference number, Description, Current Target % complete, Actual % complete, Variance from target. That table is taken from the ["Housing Consumer Standards Programme - December 25 Highlight Report"](#)

Delivery of Asbestos surveys - 20 Dec 2024

"Daily target agreed with CASA to complete communal re-inspections on all 184 outstanding properties by 12th September 2025." - Page 18 - "Landlord Compliance Performance Report - July 2025.pdf"

Undertake an External Review of Asbestos Management - 31 July 2024

"The asbestos management review has been completed, and the findings report is being presented to the HCSP board, HSP & H&HDC in October. (2025)" - Page 1, "[Appendix Ai - Housing Consumer Standards Programme Highlight Report \(August 2025\)](#)"

The estimated time of a couple of months for most of these tasks is much, much shorter than the actual time taken.

Question 5.1) **Is it reasonable that the claimed total cost was less than £500k, or was that a ruse to avoid reaching the Key Decision threshold?**

I made an [FOI request for the papers that led the decision to set up the Housing and Consumer Standards programme](#)¹¹, the minutes of the meeting, and the record of the decision. That FOI request was refused.

As soon as 03 June 2024 it appears that the funding of £500k was insufficient, and Councillors were being given finance advice, which currently is not publicly known.

Due to the sensitive nature of the Self-Referral and Housing & Consumer Standards Programme, formal consultation through the normal engagement processes hasn't been undertaken to date. However, Executive Directors and Directors and other senior colleagues from across BCC are involved in the programme board or are being communicated with / consulted with through the Corporate Leadership Board.

Finance Advice: [REDACTED]

[REDACTED] Also, to be determined at this point is the split of any costs between revenue and capital.

At present, the HRA Business Plan has revenue provision of £0.5m in 2024/25 and 2025/26 for the formation of the Programme team. There is no capital provision in relation to these activities outside of normal Business as Usual programmes of work.

However an officer decision was made on 28 August 2024 to remove major building projects from the HRA Development Programme to meeting the funding needs of the Housing and Consumer Standards Programme.

["Removal of GORAM Sites Hengrove Phase 1b and Baltic Wharf from the HRA Development Programme"](#)¹²

Monetary value involved (if any): £5,000,000 in 2024/25 and £259,164,290 in future years.

¹¹ https://www.whatdotheyknow.com/request/decision_to_setup_housing_and_co

¹²

<https://democracy.bristol.gov.uk/documents/s102104/5.4%20Appendix%20C%20-%20ODN%20-%20Goram%20Site%20removal%20from%20HRA.pdf>

Following a review of the current HRA Business Plan this Notice reflects that there needs to be a reduction in the development programme to address in year and future capital pressures, particularly those associated with addressing the Consumer Standards Regulatory Judgement from the Housing Regulator."

The decision to cancel spending on that building program has resulted in negative press for the Green party, e.g. "[Anger over decision to pull out of housing plans](#)"¹³ and "[The city's largest council house building programme for a generation has been scrapped by Green proclamation](#)".¹⁴

Question 5.2) **Did the initial estimates that the remedial tasks would be done in a matter of months, lead to an under resourcing of the Housing Consumer Standards programme, and so caused a slower improvement than would have happened if the programme was sufficiently funded from the start?**

6. Background regarding the 50% Increase in Remuneration for the Director of Homes and Landlord services Just Prior to his Departure in the Days Following the Barton House Evacuation and Associated Questions

Donald Graham, the Director of Home and Landlord services was the person who was corresponding with Arup about the state of Barton House. This gentleman appears to have either given or received notice in the days following the Barton House evacuation, as his last day at BCC was in early 2024.

The remuneration for this Director increased by close to 50% in his final year. The reason given was that his position was regraded, and that regrading was retroactively applied from his start date.

Please see the public forum of the [Human Resources committee - 15 July 2025](#)¹⁵ ([video of the meeting](#)¹⁶) as evidence.

At the [Human Resources Committee - 21 October 2025 Public Forum](#)¹⁷ ([video of meeting](#)¹⁸) I followed up this line of questioning.

Question: According to the minutes: "Under Council policy, re-evaluation of roles is authorised by the Chief Executive. In accordance with the Council's Pay Policy, the change in salary for the re-graded role was approved by the original Selection Committee." The relevant section in the current pay policy says: "Re-grading of Executive Director and Director roles is considered

¹³ <https://www.bbc.co.uk/news/articles/ceqnvw0qwjzo>

¹⁴ <https://thebristolian.net/tag/hengrove-park/>

¹⁵

<https://democracy.bristol.gov.uk/documents/b37592/Supplementary%20Dispatch-%20Public%20Forum%2015th-Jul-2025%2010.00%20Human%20Resources%20Committee.pdf?T=9>

¹⁶ <https://www.youtube.com/watch?v=iyApvZcAeXY>

¹⁷

<https://democracy.bristol.gov.uk/documents/b38084/Public%20Forum%20and%20TU%20Forum%2021%20Oct%202025%2021st-Oct-2025%2014.00%20Human%20Resources%20Committee.pdf?T=9>

¹⁸ <https://www.youtube.com/watch?v=Xku95DGiHhw>

by the Chief Executive where there is a significant change in the job purpose or job outcomes." What was the significant change in job purpose or job outcome resulted in the Chief Executive deciding to apply a retroactive re-grading for the role of Director of Homes and Landlord services.

Response: *The role of Director of Homes and Landlord Services was broadened to encompass Housing Delivery, and was re-evaluated on this basis. The role was re-evaluated by an external, independent assessor, which resulted in a re-grading of the role.*

This regrading happened in late 2023/early 2024, and so the pay policy from [1 April 2023 to 31 March 2024](#)¹⁹, was in effect.

The provision for "re-grading" did not appear in that year's pay policy, but was added in section 3a of the [Pay Policy Statement for 1 April 2025 to 31 March 2026](#)²⁰

This was confirmed during a supplementary question where:

- i) Husinara Jones, a senior legal officer confirmed that the regrading was not authorised by the pay policy in effect when the regrading of Donald Graham's role occurred.
- ii) Councillor Dudd said that the pay policy has been altered in subsequent years to "regularise" changes that were done as emergency measures in previous years.

Question 6.1) **As the 'regrading' was not mentioned in the Pay Policy active at the time, was this unlawful?**

Question 6.2) **How is giving someone a pay rise during their notice period in the interest of the public?**

Question 6.3) **Was the workload of the Director of Homes and Housing reasonable, or was the gentleman given too many responsibilities?**

7. Stock condition surveys

At the Cabinet meeting on 6th June 2023 there was a report to allocate money to an ['enhanced stock condition survey programme'](#)²¹.

*1. Bristol City Council manages almost 27,000 units of social rented accommodation. We have a rolling programme, aiming to complete 5000 stock condition surveys per year to ensure properties are surveyed every 5 years. **Since 2020 our performance levels have been significantly under due to:***

- *Limitation accessing properties due to Covid-19 restrictions.*
- *Difficulties recruiting and retaining staff to complete the work.*

¹⁹ <https://www.bristol.gov.uk/files/documents/6077-pay-policystatement-2023-24/file>

²⁰ <https://www.bristol.gov.uk/files/documents/9049-pay-policy-statement-2025-to2026/file>

²¹

<https://democracy.bristol.gov.uk/documents/s84139/Stock%20Condition%20Surveys%20Cab%20report%20V2.pdf>

When the report was presented in June 2023, there had been four (4) surveys completed in the previous twelve months.

While it is technically accurate to describe 4 surveys as 'significantly under' the goal of performing 5000 per year, it is extremely misleading.

It gave councillors and the public a false sense of the scale of the problem.

It would have been more accurate to describe the situation as "Due to COVID-19 BCC stopped doing stock condition surveys in 2022".

At the Audit Committee on 27 January 2026, I asked a question about the number of Stock Condition surveys done.

Question two title: CRR60 - Progress Update Report

Question two: Please produce a table that shows how many stock condition surveys have been done per month from January 2021 onwards.

Response

| Month | Count of UPRN | | | | | |
|--------------------|---------------|------------|----------|-------------|-------------|--------------|
| | 2021 | 2022 | 2023 | 2024 | 2025 | |
| Jan | | 67 | | 9 | 857 | |
| Feb | | 92 | | | 740 | |
| Mar | | 58 | | | 288 | |
| Apr | | 9 | | | 68 | |
| May | 15 | | | 3 | 888 | |
| Jun | | | | 3 | 985 | |
| Jul | 77 | 1 | | 825 | 623 | |
| Aug | 103 | 1 | | 931 | 1006 | |
| Sep | 88 | | | 838 | 703 | |
| Oct | 60 | 1 | | 250 | 392 | |
| Nov | 95 | 1 | 9 | 821 | 1193 | |
| Dec | 30 | | | 554 | 939 | |
| Grand Total | 468 | 230 | 9 | 4234 | 8682 | 13623 |

This is the first time that Council Officers have given an accurate description of the state of the Council's stock survey program.

Question 7.1) **Given that no committee was told that the stock condition survey programme had effectively ended, how does this not amount to deception?**

8. Why this was done

If the proper procedures had been followed and the Housing and Consumer Standards programme had been established through a decision taken at a public meeting, it would have been a matter of significant public interest.

It may well have influenced the outcome of the Bristol local elections held on 2 May 2024 and the general election held on 4 July 2024.

By keeping the matter confidential, officers conferred a political advantage on the Labour Party.

9. Conclusion: Why this matters

Council tenants have been living in homes that are suffering from damp and mould. There is a huge backlog of repairs and electrical safety checks. People are having the Gas supply to their homes 'capped', aka cut-off, due to missed safety checks.

The Officers in the council have continued to give incomplete and inaccurate reports on the state of the Council's housing stock. For example, the percentage of homes that meet the decent homes standard has been reported as over 90% for years. It turns out this figure was just 'miscalculated'.

[A major problem lies with the data. Previously Bristol City Council staff did not take into account whether homes had cavity wall insulation or not, a big factor in how warm a home is, when estimating how many homes met standards.](#)²²

This information appeared only on page 23 of the [December 2025 Landlord Compliance report.](#)²³

The project to deploy the NEC system appears to have been mismanaged. This project, which was originally meant to be completed before the end of 2024, is still not complete.

The deployment has caused problems for both tenants and Housing Officers: [Since the software went live, the number of overdue repairs on council homes jumped from 8,000 to 20,000, but council staff say they can't trust these figures which are inaccurate. And council tenants now need two separate email addresses if they want to bid on a new home.](#)²⁴

The Bristol Post reported that tenants must now use two email addresses to manage rent accounts and bid for homes following the IT upgrade.

On the 18th December 2025, an urgent decision was taken to increase funding for the Housing IT Transformation [programme by £1.257m.](#)²⁵

The project was already more than a year late when the additional funding was approved. No clear reason for the basis for the urgent decision to increase funding has been given.

I note that both the Housing IT programme manager and Executive Director of Housing left the council at the end of December 2025.

This is an ongoing massive failure of governance that has wasted public funds, and had large ongoing detrimental impacts on Bristol Council's tenants.

Tenants, including elderly people and people with disabilities, such as needing a mobility scooter to get around, are being told to travel down to 100 Temple Street to resolve IT issues with their login to the Housing System that they are required to use to pay rent.

All of this follows the emergency evacuation of Barton House on 14 November 2023. It appears that the building needed to be evacuated as the Council had simply not prepared for the change in Fire Safety laws that came into effect in September 2023.

²² <https://www.bristolpost.co.uk/news/bristol-news/thousands-council-homes-bristol-hot-10831163>
²³

<https://democracy.bristol.gov.uk/documents/s122678/Appendix%20Aii%20-%20Landlord%20Compliance%20Performance%20Report%20December%202025.pdf>

²⁴ <https://www.bristolpost.co.uk/news/bristol-news/roll-out-botched-project-regrettable-10827724>

²⁵ <https://democracy.bristol.gov.uk/ieDecisionDetails.aspx?ID=2956>

The initial evacuation was handled incredibly poorly, with almost no information given to tenants on the day of the evacuation. The length of time people would need to be out of their homes was not communicated to them. It should have been, so that people knew to pack medicine and food, particularly for young people.

The evacuation cost millions of pounds to handle, was traumatic for the tenants and has led to a lack of trust in the Council being able to manage housing.

Appendices

Appendix 1 - BCC risk scoring system

| LIKELIHOOD AND IMPACT RISK RATING SCORING | | | | |
|--|--|---|---|---|
| Likelihood Guidance | | | | |
| Likelihood | Likelihood Ratings 1 to 4 | | | |
| Description | 1 | 2 | 3 | 4 |
| Numerical Likelihood | Might happen on rare occasions. Less than 10% | Will possibly happen, possibly on several occasions. Less than 50% | Will probably happen, possibly at regular intervals. 50% or more | Likely to happen, possibly frequently. 75% or more |
| Severity of Impact Guidance (Risk to be assessed against all of the Categories, and the highest score used in the matrix). | | | | |
| Impact Category | Impact Levels 1 to 7 | | | |
| Service provision | 1 | 3 | 5 | 7 |
| Communities | 1 | 3 | 5 | 7 |
| Environmental | 1 | 3 | 5 | 7 |
| Financial Loss / Gain | 1 | 3 | 5 | 7 |
| Fraud & Corruption Loss | 1 | 3 | 5 | 7 |
| Legal | 1 | 3 | 5 | 7 |
| Personal Safety | 1 | 3 | 5 | 7 |
| Programme / Project Management (including developing commercial enterprises) | 1 | 3 | 5 | 7 |
| Reputation | 1 | 3 | 5 | 7 |

Appendix 2 - Transcript of supplementary question Human Resources committee - 15 July 2025

Mr Ackroyd: So first supplementary question be uh another thing that confuses me in the pay policy statement for 23 24 it says that requests for increases in pay for executive directors and directors that are within 10% of the minimum of the relevant range can be approved by the chief executive. Requests for any other changes to the pay of executive directors or directors will be determined by the human resources committee. Um the change to the director of homes and landlord services seems quite a bit more than 10%. Did his regrading come before this committee?

Cllr Dudd: I think um Steph will follow on for me but um I think there's a diff when when there's a regrading of a position that's a matter for the chief executive. That's my understanding of it. We're often um consulted on it. I think if it was um for a pay rise within a grade uh then then that would be

a matter for us but where there's been a regrading um that's a matter for the chief executive but we I wasn't the chair of the HR committee at the time but I assume the person that was the chair or the committee would have potentially been consulted informally on that. I'll just let Steph.

Council Officer: Yeah, I think the distinction here is that it was a re-evaluation of the role um and that is done in accordance with our policy statement. So it is the chief executive's decision to approve a reevaluation role but the decision to implement that would be one for the selection committee and they were approachment.

So the selection committee that appointed that individual would have been consulted.

Council Officer: Correct. Okay.

Cllr Dudd: Thank you. Okay. Good. Um do you um so both supplementaries on that question?

Mr Ackroyd: Yeah. Yeah. Uh this so another thing that I'm confused by is that in the document Bristol City Council senior employees as at 31st December 2023 it says the director of homes and landlord services was level three and being paid uh £114,000 uh as at 31st of December 2023. So at some point in 24 after the massive debacle which was the evacuation of Barton House, this gentleman somehow negotiated a huge pay rise which was also retroactively applied to his previous year's salary. I would have thought that he'd been in a very weak negotiating position. What was the extra £64,000 for?

Cllr Dudd: I don't know if you want to say something about re-evaluation process. I I just point out as well this would have been in his uh notice period because I'm assuming directors have 3 months notice and he left his last day was in February 24. So this would this would renegotiation with salary would have been it notice period.

Cllr Dudd: So yeah I don't think there's any connection with the with the two um issues if I'm honest with you. Um if you so what was the payment? Yeah, if you if you look at um if you look at that position that was the kind of um senior officer within that within that service. Okay. And if you can see subsequent subsequently we've appointed an executive director for that position. So I think the view was the responsibility that that individual had wasn't graded correctly. um and and that's been borne out by the fact that we've appointed another senior person to run that service um in subsequent um months. So it's a from my point of view it's a genuine review of the actual work that individual is doing and then matching it to an appropriate uh grade and I don't think I don't think that makes makes much sense. I think this looks like a payoff to get him to go away quietly. I will be firing the relevant documents, but this this just looks Yeah, that's I mean that's just speculation, isn't it?

Appendix 3 - Transcript of supplementary question Human Resources committee - 21 October 2025

Mr Ackroyd: So, yeah, two supplementaries. My first question was not answered. I asked very precisely which part of pay policy that was active at the time allowed the chief executive to do the regrading. I can see the relevant part during the subsequent year's pay policy but the for the year in effect I cannot see which part of the of the pay policy that was active at the time allowed for this regrading to happen. My question was precise. Can I have a precise answer please?

Cllr Dudd: Is that is that something we could further elaborate on that or should we keep going back get back to you in writing?

Council Officer, Husinara Jones: I'm happy to answer that. I think the point that um that we're trying to address is that the chief executive as the overall manager can agree to a re-evaluation process. So that is a set out for a high manager of the individual affected. Okay. and the actual implementation if there's a regrading or an increase in salary sits within either the terms of reference the selection committee.

Mr Ackroyd: Okay. My precise question is which part of pay policy that was active at the time is being relied on here.

Council Officer: It's not specified in the pay policy.

Cllr Dudd: So the answer is it's the head of pay capacity of head of pay service. They've got the right to do that. It's kind of separate to the pay policy. It's because he's not taking a decision on implementing a change in pay. It's a process of reevaluation. The outcome of a process may be that there is no change in salary.

Cllr Dudd: Okay. Thanks. Do you have another supplementary?

Mr Ackroyd: Let me just have a moment to think about that. I guess my second supplementary then is if I've understood the answer just given that the regrading wasn't actually in the pay policy of the current of the year that was in effect and it only got added in a later pay policy. Is that a correct understanding of the situation?

Cllr Dudd: I I think um like over a period of time some issues do come up. I think had as obviously I wasn't on the HR committee but over a couple of years the policy was amended to better reflect the real world situation and I think members at the time I can't remember exactly who was on the committee at the time asked for further clarity to be added to the paper going forward. So I think that's why it's become more um uh you know strongly uh worded in in sub subsequent pay policies because members of the committee have asked for that to be added to the pay policy to make it more uh transparent I guess.

Appendix 4 - public forum question for urgent spending for decision for IT project

Question 11: Dan Ackroyd, Urgent spending

For the Homes and Housing Policy committee meeting on 31st October, 2025 the minutes says:

"In response to a question about the cost of implementing the NEC system, it was noted that the while the system is still being implemented the committee will be kept up to date with the cost implications."

On the 18th December 2025 an urgent decision was taken

<https://democracy.bristol.gov.uk/ieDecisionDetails.aspx?ID=2956>:

"Approval to spend up to £1.257m, split 80% Housing Revenue Account, 20% General Fund, for the remainder of the Housing IT Transformation Programme Delivery in this Financial year (25/26)."

Please provide details of what this money was for, and why it needed to be taken as an urgent decision?

Response:

Details of what the funding was for and why it was taken as an urgent decision was outlined in the Urgent Decision Notice published here: [ModernGov - bristol.gov.uk](https://moderngov.bristol.gov.uk)

Excerpt from the Urgent Decision Notice included below for ease of reference. For further details please see document in full:

The Housing IT Transformation Programme was initiated in 2022 with the objective of implementing a new housing IT management system by March 2024.

In February 2023 Cabinet approved £7.5m to deliver the programme.

In October 2025 we went live with the majority of the modules as part of the NEC Housing system. Whilst a significant achievement, this delivery represents a two-year delay to planned Go Live, and during this

extended delivery, the programme scope has changed and been updated to reflect additional assurance, compliance and reporting requirements.

These delays and additional scope requirements mean that at the end of November 2025 the programme has spent the £7.5m to deliver the programme in full.

However, there is still further work required to deliver the programme as per the Business Case and additional emergent scope requirements that need to be considered for inclusion in the programme scope going forward. This urgent decision reflects the additional resources and IT capabilities to continue delivering the agreed scope at pace for the remainder of 25/26.

The additional capital and revenue funding requirements for 25/26 have been previously highlighted as part of the regular period Budget Forecasts and are included as pressures in forecasts to the end of the Financial Year.

REASONS: This decision cannot reasonably be deferred until the next Committee decision in 2026 as there is an urgent requirement to fund the additional resources and IT capabilities to continue delivering the agreed scope of the programme at pace for the remainder of 25/26