Consumer standards review

Warwick District Council

JUNE 2024

Strictly private and confidential

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CONSULTANCY

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1   Introduction and overview

Warwick District Council (the Council) commissioned HQN to help them with their preparations to achieve compliance with the consumer standards, which were introduced in April 2024, following the passing of the Social Housing Regulation Act and to be prepared for an inspection of its service. The Council provided HQN with a completed self-assessment and supporting evidence.

HQN carried out the following activities:

- Desktop review of supporting documents – the Council had not undertaken a self-assessment but had developed an action plan. Many documents were provided following the on-site work and presentation of findings. We have commented on these as appropriate

- A combination of meetings, focus groups and workshops with key staff and managers, involved residents and other key stakeholders, to explore and probe issues we identified from the desktop work

- Reality checks to test the service on the ground, including estate inspections, checks of ready to let empty properties, a visit to a newly refurbished scheme, checks of ASB files and a review of complaints.

This report sets out our findings and recommendations which should form the basis of an improvement plan. The report and our findings should have no surprises for the Council. We discussed our findings as they came up with colleagues within the Council and at the feedback session. It is clear that the Council is some way short of being able to demonstrate compliance with the consumer standards. You self-referred to the Regulator of Social Housing (RSH) in November 2023, due to concerns around compliance across a number of areas and we found other areas where we believe you are non-compliant with the safety and quality standard, to the extent that we recommend that you have a further conversation with the RSH around the following issues:

- You have no clear HRA asset management strategy

- You lack accurate and up-to-date stock condition data

- There is no clear action being taken on known non-Decent Homes

- We have concerns around the reliability of your data in respect of your stock.

In respect of the other consumer standards, while there are not necessarily areas where we would recommend self-referral to the RSH, there are some critical areas of service that are unlikely to meet the Regulator's expectations. These include:

- The Regulator expects providers to know *"who is behind every door"*, ie, have up-to-date, accurate data on all your households. However, we were unable to ascertain what level of household data you currently hold and were advised that there is a backlog of tenancy audits, the process by which you are planning to obtain this critical information

- Resident engagement has *"recently restarted"* and you are therefore unable to demonstrate outcomes, in particular how tenants are influencing service delivery or holding you to account

- The level of complaints logged is very low and it appears that many complaints are being logged as service requests

- Core strategies and policies across the service are not in place, though following our site work, we were provided with several draft policies

- Your average re-let times for vacant properties are very poor and our reality checks of ready-to-let properties indicated inconsistencies in meeting the lettable standard.

As part of our feedback, we provided the following priorities for action:

- Take urgent action to address identified areas of concern – especially safety and quality and complaints management

- Establish a clear plan for the collection, analysis and use of household data

- Update your action plan with target completion dates and monitor progress

- Prioritise other areas for action – in the event of an early inspection, you can show you have identified challenges and targeted resources to them

- Leadership is required to make progress on key areas, especially safety

- Culture and system change is required to give staff the tools and skills they need to deliver services based on data.

There is a real need to focus resources by agreeing a SMART improvement plan and evidencing the outcomes achieved via this plan. The challenge will be to put together a realistic and deliverable SMART plan. HQN will, of course, support you in this process. Once agreed, implementation of the plan should be overseen by senior managers and reported through the governance framework. Key councillors need to be actively engaged in the process.

2   The regulatory framework

The social housing sector has seen, and continues to see, significant change in terms of statutory and regulatory expectations. The Grenfell Tower tragedy precipitated major changes in building safety legislation and the regulation around the construction and management of housing in England. The death of Awaab Ishak in Rochdale, multiple severe maladministration findings by the Housing Ombudsman and comprehensive social, print and television media exposes of actual or perceived failings by social housing providers has brought about a far more rigorous regulatory regime with the return of inspection of providers. There has been cross-party and, predominantly, cross-sector support for many of these changes.

The Government is imposing higher standards in several ways, including:

- Bolstering consumer regulation of housing, enforced by inspection by the RSH

- Putting the Housing Ombudsman Service on a statutory footing. Its headcount has increased by over 200% in recent months, while the number of severe maladministration determinations by that service has increased by over 300%

- The RSH is gathering perception and safety data on all landlords and this will be published. We fully expect that third parties will turn this data into league tables (as The Times has done with Oflog data).

Throughout all this period, the three main anchors of the new regime will stay the same.

- The whole point of the exercise is to prevent any repeat of the deaths at Grenfell and Rochdale and the many cases of poor treatment we see in the media

- Leaders at councils, arm's length management organisations (ALMOs) and housing associations must inspect their own services to test that they are meeting the consumer standards. When they fail to do so they must refer themselves to the RSH

- The consumer standards cover every interaction landlords have with their tenants. So, it is a wide agenda to cover.

The revised consumer standards have been in place since April 2024 and will be monitored for compliance by the Regulator of Social Housing. These are set out in the following graphic:

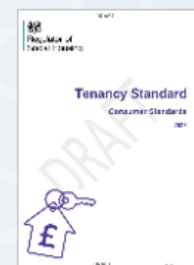| Safety & Quality	Transparency, Influence & Accountability	Neighbourhood & Community	Tenancy
Stock quality – individual property level. DHS compliance H&S compliance Effective repairs service Adaptations	Fairness and respect Diverse needs and equitable outcomes Engagement with tenants Information Performance information Complaints	Safety of shared spaces Local cooperation ASB and hate incidents Domestic abuse	Allocations and lettings Tenancy sustainment and evictions Tenure Mutual exchange

The standards cover the full range of interactions with tenants and it is clear that landlords must inspect and satisfy themselves that they comply. We know that the Regulator will inspect the Council's services at some stage in the next four years (and then continue on a cyclical basis). Where the Council sits on that programme will be based upon an assessment of risk and assurance, among other factors.

When the RSH inspects the Council, it will award a C (consumer) rating, as per the following criteria:

- C1 = landlord is delivering the standards
- C2 = some weaknesses and improvement is needed
- C3 = serious failings and significant improvement needed
- C4 = very serious failings and fundamental changes required.

C1 and C2 mean you are compliant, despite the wording. The RSH has wide powers to enforce the consumer standards, including carrying out surveys and remedial works, the imposition of unlimited fines and the setting of performance improvement plans.

The key messages from the Regulator have been:

- Tailor your expectations – this is something new for the sector so do not expect to be good at it right away
- Co-regulation is the order of the day – there will be a spotlight on councillors

- Assessments will be outcome based
- Your approach should be three dimensional – know your tenants, know your homes and show how this is influencing your service.

We recommend that you are clear about who does what and where responsibilities and oversight rests. It is worth setting out on one sheet of paper:

- How the services are delivered
- Where they are reported to and how they are monitored
- How and where decisions are taken and risks managed/mitigated
- How and where the tenants' voice is heard.

3   Providing assurance

We are at the beginning of a new regulatory process, so providers have little hard evidence on which to base their assessments around compliance. The RSH did carry out pilot inspections prior to the standards coming into place, but no written reports were produced. However, we have had verbal feedback from several of the pilot organisations and the RSH has spoken at a number of events recently, so we know that the following are (some of) the "big ticket" items that providers must focus on:

- Compliance with the standards – as stated above, the RSH does not expect many organisations to be rated as C1 in the short term. But it is critical that providers get the basics right
- Compliance – It is also clear that the safety and quality standard is the *"first among equals"*. Compliance keeps tenants safe and in homes that are well-maintained, with modern facilities. It is also the standard – almost without exception – that is leading providers to self-refer. So, providers need to be achieving near perfect "scores" against the big six compliance areas, while performing well in tackling damp and mould issues, and having a good oversight of all other areas of (potential) health and safety concern
- Reliability of data – property and people. The Regulator will want to test assurance that data is robust
- Hearing and acting on the resident voice – the point of the exercise
- Presenting material to the RSH – when you are selected for inspection, first impressions matter. You must ensure your submission to the RSH is comprehensive, professional and focused. You need to demonstrate to the RSH that you know your service, understand the challenges, and have SMART plans in place to achieve compliance and seek continuous improvement

- Governance – the RSH sets the bar high in this area. So, you need to ensure that your councillors really understand the consumer standards and the regulatory regime, that they set the strategic direction, understand the challenges and address them and that they seek and receive assurance on key issues
- Priorities for action – *"strategy is for amateurs, logistics is for professionals"*. While it is important that the Council has up-to-date, relevant strategies and policies, they need to be living, breathing documents, that are being delivered on the ground.

The final bullet above – which focuses on delivery against strategies and plans – is critical to providing the assurance the RSH will be seeking in terms of compliance. In particular, the RSH will look for the following:

- Ready availability of up-to-date, relevant documents (strategies, policies and plans)
- Use of data in regular reviews – drawing together of information about properties and people
- Clear priorities in SMART action plans – monitored for delivery
- Demonstrable use of customer insight in setting and monitoring strategies and plans
- Understanding and ownership of risk at all levels of the business including chief officers and elected members
- (Key) councillors really invested in the service – understanding the challenges, setting priorities, monitoring and challenging delivery

Our assessment of the Council's position in respect of the standards is based upon recognition of the above factors. During our review, documents were provided on time, the on-site arrangements were well organised and support to follow-up on queries and arrange meetings was very helpful.

However, many documents we would expect to see were not available. We were advised that many of these were in development at the time of our visit. We have subsequently received several policies, which we have been advised are in draft. However, it is not clear how these various policies have been produced. There does not appear to be a consistent format or style for the policies. It is not clear how they have been developed, whether tenants have been involved in their development, or whether they have been signed off. There are examples where the policies do not appear to reflect the reality of service delivery within the Council (we refer to this in more detail later in this report).

The Council has produced a consumer regulation action plan to drive forward its actions to achieve compliance. However, the plan is not SMART, as it contains no dates for completion of activities, or target dates for Cabinet approvals where required.

Finally, but critically, there is a lack of data – for example, on outcomes for tenants and on diversity. Without addressing these and other critical issues, the Council is not likely to provide reassurance to the RSH that it is anywhere close to compliance with the standards – or likely to achieve compliance within a reasonable timeframe.

4   Tenant Satisfaction Measures (TSMs)

We were provided with the draft outturn figures for 2023/24, the first year of collecting and reporting on TSM scores. We refer to the performance measure results under the relevant sections in this report. In respect of tenant perception, the Council achieved the following levels of satisfaction:

- Overall satisfaction = 78%

- Satisfaction with repairs = 78%

- Satisfaction with time taken to complete most recent repair = 74%

- Satisfaction that the home is well maintained = 77%

- Satisfaction that the home is safe = 80%

- Satisfaction that the landlord listens to tenant views and acts upon them = 64%

- Satisfaction that the landlord keeps tenants informed about things that matter to them = 74%

- Agreement that the landlord treats tenants fairly and with respect = 80%

- Satisfaction with the landlord's approach to handling complaints = 40%

- Satisfaction that the landlord keeps communal areas clean and well maintained = 58%

- Satisfaction that the landlord makes a positive contribution to neighbourhoods = 61%

- Satisfaction with the landlord's approach to handling anti-social behaviour = 56%.

According to the draft report we were provided with, the majority of the perception scores put Warwick DC in the second quartile, when compared with local authorities of a similar size and also within the geographical area. However, while this is therefore relatively decent performance, it should not in any way be taken as indicating compliance with the consumer standards.

5   Safety and Quality Standard

This standard focuses on the landlord requirement to provide quality homes which are safe and secure. It emphasises the need to make best use of resources to deliver Decent Homes and beyond.

The standard covers the following specific areas:

- Stock quality
- Decency
- Health and safety
- Repair, maintenance and planned improvements
- Adaptations.

Overview

In HQN's opinion, the current position, as highlighted in the evidence provided, will not provide the level of assurance the Regulator (RSH) will be seeking to confirm compliance with this standard. In isolation, we would not expect the RSH to rate this standard any higher than a C4.

We are aware that Pennington Choices carried out a compliance health check and expressed significant concerns around a number of issues, in particular fire safety, legionella and asbestos, as a result of which the Council self-referred to the RSH in November 2023. We were advised that the RSH determined that no breach had taken place but that there is ongoing dialogue. There is a robust recovery plan in place with member oversight at the newly formed compliance committee. As a result of this, HQN avoided duplicating work and focused on other areas of the Safety and Quality Standard.

In summary, we found the following:

- There is no clear HRA asset management strategy
- There is a lack of relevant policies
- There is a lack of accurate, up-to-date stock condition information
- No action has been taken on known non-Decent Homes
- There are concerns with data reliability.

Stock quality and decency

We found several weaknesses within this area. The Council currently has no approved HRA asset management strategy (AMS) in place. The most recent AMS and action plan, which was produced in 2019, focused on corporate not HRA assets. The strategy ran to 2023, so is also now out of date. The existence of an up-to-date, credible, AMS is likely to be a fundamental expectation of the RSH.

Similarly, the RSH will expect the Council to have – or at least be working towards having – a recent, validated stock condition survey (SCS), that is based upon a 100% internal inspection of properties (ie, not derived via cloning from a survey of a smaller percentage of stock). We found that the Council last completed a SCS in 2016, albeit a comprehensive one at the time (100% external and 89% internal).

In August 2023, the Council appointed an external contractor to undertake a new survey of 100% of properties by end of May 2024. As at mid-March 2024 (at the time HQN was undertaking its fieldwork), 55% of stock had been surveyed. However, the Council's surveying team reported inaccuracies with the new data when undertaking validation surveys for the 2024/25 major works programme.

Based on a 55% completion rate, approximately 2,300 properties were outstanding with a proposed completion date less than three months away. Attempting to complete the outstanding surveys in less than three months (that is over 200 properties per week) would present a significantly increased risk to data reliability.

In addition to the challenges of undertaking the surveys in the timescale and the accuracy of the data, Council staff raised concerns about the limitations of the existing data storage platform (although a temporary arrangement has been put in place) and the limited experience of the data analyst.

We found that more than 1,000 (21%) properties) have no energy performance certificate. Although this does not put the Council in contravention of relevant statutory requirements, as there is no legal requirement to carry out the inspections until the properties become vacant, it does mean that the Council cannot provide assurance that these properties meet the Decent Homes Standard.

The code of practice is clear that providers should assess the condition of homes frequently enough and in sufficient depth to maintain assurance on their quality and safety. Providers should ensure their approach to assessing and recording the condition of their homes is robust and kept up to date by using information from a range of relevant sources such as repairs, complaints, health and safety assessments and energy performance certificate (EPC) data to maintain a rounded view of condition. For this reason, the Council is non-compliant with the consumer standard.

The Council's HRA decarbonisation and energy efficiency strategy aims to achieve EPC C by 2030 but the agreed funding needs to be considered within the context of the full SCS, an updated 30-year HRA business plan, maintaining the Decent Homes Standard (DHS) and considering any other competing priorities.

As of January 2024, there were 199 properties known to fail the DHS. This was based on a snapshot of 50% of SCS. However, it is difficult to rely on this figure as being accurate given that it was based upon the fact that only 44.4% of the SCS had been completed by mid-February. Furthermore, the Council's surveying team confirmed it was unaware of the addresses of non-Decent Homes.

We identified a further concern relating to safety, namely that there were 22 addresses identified as having outstanding HHSRS (housing health and safety rating system) risks. Again, we question the accuracy of this snapshot given that the full SCS has not been completed.

Finally, in this area, it is unclear when 100% of properties will meet Decent Homes Standard (DHS), which is a legal requirement or how decency, once achieved, will be maintained given the data management limitations.

Health and safety

We identified several weaknesses in this area. As stated above, the Council self-referred to the RSH in November 2023. Although the breach has not been registered, there are regular meetings with the Regulator, a robust recovery plan for compliance is in place and progress is being managed and monitored. A compliance committee has been established with member oversight. Although the reasons behind the self-referral are a cause for concern, even without a breach being registered, there has been a positive response from the Council.

While the "big six" health and safety risks (ie, fire, legionella, asbestos, gas, electrical, lifts) are being managed, it is not clear that all areas of potential risk are being monitored and managed adequately. The Council should take steps to ensure all elements of its homes and communal areas are monitored for risk and any risks mitigated. This includes matters such as barriers, electric gates, grab rails in independent living schemes.

Positively, the Council does have a damp and mould policy in place. The policy sets a target to inspect within five days of an initial report. Currently most jobs that have been inspected by internal resource, are subsequently passed to an external specialist contractor to re-inspect (thereby building in unnecessary costs, delays and inconvenience for the tenant). The contractor produces a report within three days and work is usually approved. At the time of our on-site work, there were 74 live damp and mould jobs on the system, of which 38 were outstanding for more than over 30 days. Further, there is no specific damp and mould performance monitoring in place, or any follow-up checks planned to ensure any remedial work has been a success.

Repairs, maintenance, and planned improvements

We found several weaknesses within this area of the standard. Crucially, there is no repairs policy in place, as a result of which, there is a lack of visibility for tenants as to what they can expect in terms of service and a lack of information on which to hold the Council to account. Following our feedback, we have been provided with a copy of a housing repairs and maintenance policy. We have been advised that this is one of several policies that is currently in draft form. We assume therefore this policy has not yet been signed off and it is unclear what process has been followed to produce the policy (for example, whether there has been any tenant consultation).

The policy appears to be a generic policy which, in some aspects, does not reflect what we were told during the course of our work. For example, the policy refers to the following repairs categories:

- High priority
- Tenants choice
- Scheduled repairs.

However, we were provided with information to the effect that there are two formal repairs categories, namely, emergency (four to six hours) and general repairs (30 days). In addition to this, there are two further unpublished categories, namely urgent repairs, which are considered on a case-by-case basis but have no published timescales and an unpublished 60-day category (referred to in interviews) where more than one trade is involved in carrying out the repair works.

The policy also refers to a strategic director and to an in-house repairs team, neither of which exists.

We also found that repairs performance is being incorrectly calculated when a job requires a pre-inspection, thereby, potentially, making your repairs performance look better than it is.

On a positive note, we were advised you flex your service offer for vulnerable tenants, with additional repairs provided on the approval of the housing management team.

In respect of access to the service, tenants can report repairs via an online form, phone or use the Council's app. We tested the speed at which calls were answered by the contact centre and found they were answered within a short timeframe. When a tenant phones to report a repair, the system flags up where access is required for a gas compliance check.

For gas and electric repairs, tenants can select an option to speak directly with contractors' staff. However, for most general repairs no appointments are offered at the first point of contact. The general repairs contractor contacts the customer within two days of the initial call, which is not positive practice.

The Council does not record statistics in relation to the number of calls or other communication where the tenant is chasing repairs that have previously been ordered, which is a key indicator of how successfully the repairs service is being delivered. The percentage of repeat calls by tenants is unclear, given that tenants can chase up previously reported repairs directly with the repairs contractor.

Responsive repairs service performance is a cause for concern. While on site, we were advised that 98% of emergency repairs are completed on time. In its response to our draft report, the Council advised that there is *"no evidence this is a cause for concern as there will always be no access despite emergencies."* However, by definition, emergency repairs are invariably a matter of critical health and safety and therefore non-completion of 2% of such orders is a cause for concern, regardless of the reasons for no access. Further we were not provided with any information to support the statement that the 2% related to non-access.

However, following our on-site work, we have been advised further that the (draft) Tenant Satisfaction Measure (TSM) result for RP02 repairs completed within target timescale (Emergency) is 95.78%, giving more cause for concern.

81.6% of routine repairs are completed on time, according to the draft outturn TSM data. We note that this performance fluctuates from month to month. However, performance is below target and significantly below what is regarded as acceptable performance.

We were also provided with data which indicates that approximately 800 outstanding orders are over 30 days old and no evidence was provided to show how this is being addressed. In its feedback, the Council stated that this figure includes jobs which are complete on site but awaiting financial completion. However, we were not provided with the detail.

As with most providers, repairs are the reason for the majority of complaints made by tenants to the Council and the management and resolution of complaints is a critical area to get right (see the point made earlier about the Housing Ombudsman Service). However, we found that there was a lack of awareness of the complaints policy and no monitoring of repairs complaints through to resolution. Colleagues described the complaints process as clunky and stated that tenants can get passed from one person to another, which does not provide a customer focused approach.

We found that many complaints are labelled as "service requests" when they should clearly be logged as formal complaints, and this appears to be borne out by the very low number of formal complaints logged, against the level we would expect to see. This is a key area for consideration by the Housing Ombudsman Service. Where complaints have been raised, we noted the most common theme was around chase-ups for previously ordered repairs. Other examples included complaints about planned works.

In respect of planned maintenance, we found that there is no planned maintenance policy in place, and the Council is unable to quantify the long-term investment needs and funding requirements as the stock condition information is incomplete.

Budgets for 2024/25 have been approved (Capital £9.2m and Revenue £8.9m) and a five-year cyclical decoration programme is in place. However, the 2023/24 kitchen and bathroom programmes were underspent (by 21% or £126,000). This was put down to a *"slow start and lack of properties"*. The Council surveying team had not received accurate data for 2024/25 programme at the time of our review. The team was only aware of addresses for approximately 60% of kitchen and bathroom and 15% of window and door contracts.

Adaptations

We were advised that an aids and adaptations policy was being drafted during our on-site work. Following the reporting of our findings, we have been provided with a draft policy. However, it is incomplete and it is not clear whether the service standards within the policy reflect the actual service offer.

There is some information on the Council's website, which signposts tenants to HEART. As at mid-April, there were 25 occupational therapy referrals up to three months old and 17 referrals over three months old. The approved budget for 2024/25 is £678,000. However, there was a significant underspend in 2023/24 of £572k (which was 69% of the budget). We were advised that the contractor reported labour shortages as the reason for the delays. However, the Council is unable to act because timescales and penalties were omitted from the formal contract.

Consequently, we lack confidence that the budget can be spent in the current year and therefore customers are missing out on critical assistance to live well in their homes.

Conclusions and key priorities

Overall, we found that the Council is far short of providing confidence that either it is compliant with the standard or that it can be confident of meeting it soon. The deficiencies in service are such that there is a significant journey to be made before the Council can be confident of meeting the standard. We have reviewed the consumer standards action plan, but it is effectively a list of activities. It is not SMART. For example, there are no owners set against each action, nor are there any targets to implement the actions identified. This challenge applies to all the standards.

There is a lot of work needed to meet the standard and adequate resources will need to be identified. A HRA AMS (and funding) is fundamental to establishing the strategic priorities (and vision) for the stock.

IT/IS needs to be fit for purpose – client accessible, accurate and timely data is a major determinant of success. The Council needs to ensure staff likely to be interviewed by the RSH are involved and aware of the information submitted in advance of the inspection. Further, you should ensure that all requests for additional information are acknowledged, information is provided in the format requested (not spreadsheets) and questions fully answered with a timely response.

We set out the key priorities for the Council as follows:

1   The top priority is to continue to address the compliance weaknesses in the Pennington Choices report until completion of all required actions to ensure compliance.

2   Complete all outstanding remedial work in relation to known HHSRS category one risks.

3   Take action to make non-Decent Homes decent.

4   Review the damp and mould delivery process to ensure the Council complies with the forthcoming Awaab's Law and provides value for money.

5   Validate and complete 100% SCS and update the 30-year HRA business plan to ensure the DHS is maintained and other priorities are fully funded.

6   Develop a new HRA AMS that identifies the asset management challenges and includes a prioritised action plan for the life of the strategy (five years is the norm).

7   Review the approach to managing aids and adaptations, in particular the contractual arrangements and take action to improve service delivery.

8   Use the information in this report to develop a comprehensive, SMART, safety and quality standard action plan.

9   Regularly report information on service KPIs and performance against the safety and quality standard action plan to members and routinely provide details of problems supported by proposed actions and timescales.

6   Transparency, Influence and Accountability Standard

The reforms to social housing regulation have focused on improving the quality of the relationship between landlords and their residents. For this to be effective, landlords need to embed a culture of transparency and accountability that is meaningful to residents and demonstrates fairness and respect. Residents must be able to access the information they need to make use of services. They need to be able to influence decision making and hold landlords to account. In turn, landlords must listen to residents' needs and concerns and take appropriate action to improve the way in which services are delivered.

The standard covers the following specific areas:

• Fairness and respect
• Diverse needs
• Engagement
• Information
• Performance information

- Complaints
- Self-referral.

Overview

In HQN's opinion, the current position, as highlighted in the evidence provided, will not provide the level of assurance the Regulator (RSH) will be seeking to confirm compliance with this standard. In isolation, we would not expect the RSH to rate this standard any higher than a C3 and there is a clear risk that this area could be considered C4, especially in light of complaints performance.

We found the following key issues that need to be addressed to have confidence in compliance:

- The level of data on household composition is not clear. Tenancy audits are carried out but we were advised that there is a backlog. Ethnicity for a high percentage of households is unknown and health and disability data appears to be very low
- Work on resident engagement has recently restarted – this is positive, and there is a need to continue to resource this. However, it does mean that the Council has no track record by which it can demonstrate that tenants are driving the strategic direction of the service or are able to hold the Council to account
- A lack of service standards also makes it impossible for tenants to hold the Council to account
- There is little evidence of the wider use of customer insight to inform service development
- Staff training on equality, diversity and inclusion needs to be refreshed – and the data from the EDI report (when available) needs to be shared and used in planning
- The level of complaints logged is very low and it appears that many complaints are being logged as service requests.

Fairness and respect/diverse needs

We found that staff, who we interviewed as part of the process lacked a comprehensive understanding around equality, diversity and inclusion (EDI). While they understood some diverse needs, including a focus on older people (in sheltered housing) there was lower awareness of other needs among the Council's tenants. There is no reporting on EDI issues and therefore no consideration as to how effectively the service meets the diverse needs of the Council's tenants and their households.

There is no policy around EDI. There is a need for a clear action plan on EDI and for staff training. While we note feedback on our draft findings that EDI training is mandatory for all staff who have not undertaken EDI training in the last three years, we saw little evidence that this is leading to better outcomes for tenants.

We reviewed two complaints, one at stage one and one at stage two relating to allegations of discrimination on grounds of race and disability. Our review of these suggested they were not dealt with well until the final response (from the Chief Executive).

We found that several properties had been purchased to house refugees in, but that they have been standing vacant for a long time. We note the feedback that this is due to the Home Office failing to provide placements and that the Council is in regular contact with the West Midlands Strategic Migration Partnership and Home Office. We also note also that the rent is being paid via Home Office funds.

However, while the properties stand empty, it is possible they are not being maintained. Meanwhile there are many people waiting for a home. We recommend the Council having a conversation with the relevant body to advise them that the Council intends to let these properties and make future properties available for refugees once the need arises.

Information and performance information

The information we saw as part of our review was clear. However, we recommend you review the provision of information to ensure you are catering for the needs of your diverse communities.

In respect of performance information, we found that there is very little information provided to tenants via the Council's website. The only information we could find was contained in a tenants (annual?) newsletter, dated January 2024 (and a similar publication from the previous year). The data provided is reproduced below, but it is not clear to what period the data refers, whether a financial year, calendar year or some other period. It also does not provide any contextual information, such as comparison with previous years, target or other providers.

TENANT PERCEPTION MEASURES

In general, **77%** of residents were fairly or very satisfied with the overall service provided by Warwick District Council, Housing Services, while **11%** were dissatisfied

Almost **80%** of residents said that they were fairly or very satisfied with the repairs service, while **13%** were fairly or very dissatisfied

70% said that they were satisfied with the time taken to complete the most recent repair, while **22%** were dissatisfied

77% were satisfied that WDC provides a well-maintained home which is safe to live in, while **12%** were dissatisfied

61% of tenants were satisfied with how WDC listens to views and acts on them, while **15%** were fairly or very dissatisfied

72% of those surveyed were satisfied with the way WDC keeps them informed about things that matter to them, while **9%** were dissatisfied

79% of residents agreed that WDC treats its residents fairly and with respect, while **4%** disagreed or strongly disagreed

55% of tenants were satisfied with WDC's approach to handling complaints, while 13% were dissatisfied

70% of respondents agreed that they knew how to make a complaint to WDC if they were not happy with the service they received. **10%** did not know how to make a complaint

53% were satisfied that WDC keep their communal areas clean, safe and well-maintained. **31%** were dissatisfied

61% were satisfied with the extent to which WDC makes a positive contribution to their neighbourhood. **12%** were dissatisfied

55% were satisfied with the way WDC deals with anti-social behaviour. **15%** were dissatisfied

There is no published TSM performance data on the website, yet.

On a positive note, we liked the installation of digital display screens in high-rise blocks, which allow for up-to-date information sharing.

There are no published service standards for key areas – for example, the lettable standard, so it is difficult for tenants to assess whether you are meeting expected standards.

The standard also requires the Council to publish the names and roles of senior staff, but this has not yet been actioned.

Engagement

We noted that the engagement process was very much *"wet paint"* although there has been an expectation that providers engage with their tenants for many years, so that they can influence the strategic and operational direction of the service and hold their landlord to account.

There is a new engagement strategy, which is clear and attractive. However, the challenge is to translate this into real engagement and effective use of all feedback channels. There has been some good progress in establishing a resident engagement group, with several tenants ready to support the Council's journey. But the group is very small and there is a risk of overloading responsibility onto them. These engaged tenants are a real asset and speak well of the Council. However, the Council needs to widen the pool of engaged tenants to ensure there are decent numbers involved and that they are representative of the wider tenant base.

One way the Council can encourage and promote greater engagement is to highlight the opportunities available for those who wish to engage in different ways and for differing periods of time and to evidence the benefits (outcome) of resident engagement. However, we found communications to the wider body of tenants about tenant engagement to be limited.

We also found that there was no feedback loop to consider learning from tenant feedback in complaints (a key expectation not just of the RSH but also of the Housing Ombudsman).

Complaints

The management and resolution of complaints is a key factor in influencing resident satisfaction in services and is also a significant focus, not just for the Housing Ombudsman but also the Regulator, who is likely to use intelligence from the Ombudsman service to influence priorities for inspection under the incoming regime.

We found the Council's complaints policy to be in line with the new Housing Ombudsman's Complaint Handling Code – but there is a new code in place now. We note that the complaints policy and ability to make a complaint are on the Council website, but recommend it be given greater prominence, so that it complies with the Ombudsman's expectations that the process is clear and accessible.

The Housing Ombudsman also expects providers to carry out an annual self-assessment against the code and publish it on its website. However, the Council's self-assessment is almost two and a half years old, with (admitted) several areas of non-compliance. As stated above, there is a new Complaints Handling Code in place and providers must self-assess against the code and publish that assessment by the end of June 2024. Providers are also required to submit that self-assessment to the Ombudsman. We saw no evidence that this process had begun, meaning there is now a very limited time in which to carry out the self-assessment and get the relevant signoff by management and governance processes.

We also found that the Council is logging a very low level of complaints. Staff we spoke to reported that expressions of dissatisfaction are routinely recorded as "service requests" (which is non-compliant with the Complaints Handling Code).

In 2023/24, only 29 stage one complaints were logged. Despite these very low numbers, only a small percentage of complaints are responded to within the Ombudsman's Complaint Handling Code (CHC) timescales. The draft TSM result for stage one complaints is 15.79%. The equivalent result at stage two is 25%. Ten complaints had their timelines for response extended by between three and 35 days (with the average extension being 16.3 days).

We found four complaints (all relating to repairs) which were not logged as resolved, but nor had they had their timelines extended. Three of these complaints had been open for more than five months. Only five complaints had been escalated to stage two of the process, but one had been open since last September.

We reviewed one complaint, which had escalated to stage two of the complaints process. The investigation report contained the following paragraph:

> *"The Council's Complaints Policy makes it clear that it will attempt to deal with complaints at the first point of contact and Services do have some discretion as to how they respond to complaints. This being the case, <u>it would not, in my view, be reasonable to expect every expression of dissatisfaction to be dealt with as a Stage 1 complaint</u>. I do not therefore uphold this element of the complaint. It is also not unreasonable for Council staff to be unavailable because they are on leave and are therefore unable to respond to the Complainant."*

The underlining is HQN's. It is clear from Ombudsman guidance that providers should only refuse to accept a complaint under very limited circumstances (for example, where certain legal proceedings are already underway) and we are not convinced this was a justified position in this case. It also appears that the complainant was advised that they must put a complaint in writing for it to be considered, which is against Ombudsman guidance also. Finally, the response to the complaint appears to have been written by a solicitor – and reads like one. It is very legalistic in its tone and not customer focused. We question why a solicitor is involved in a complaint response.

Conclusions and key priorities

Overall, and as with the Safety and Quality Standard, we found that the Council is significantly short of providing confidence that either it is compliant with the standard or that it can be confident of meeting it soon. The deficiencies in service are such that there is a significant journey to be made before the Council can be confident of meeting the standard. While there is a good platform on which to develop a comprehensive engagement experience, the approach to *"knowing who is behind every door"* and using that data, along with property data, to develop and flex services, is under-developed. Management of complaints and the numbers of actual complaints logged is a particular concern.

We set out the key priorities for the Council as follows:

- Consider refreshing staff training on diversity and assess the outcomes of that training – is it making a difference?

- Share EDI information: use it to shape services and to review whether existing policies deliver fair outcomes for all

- Review and revise the approach to the collection, analysis and use of household data:
  - Ensure the tenancy audit proforma is comprehensive and customer focused, and used by all
  - Set targets and monitor the completion of tenancy audits visits. Ensure there is a comprehensive approach to the collection of data (every visit is an opportunity)
  - Ensure widespread understanding (by staff and tenants) of why data is being collected and what it will be used for
  - Develop a strategy for how data will be used

The box below sets out an example exercise in this area:

Household data collection exercise (example)

- **Why collect?**
  - Know who is behind every door
  - Influence service design and tailor services
  - Understand the level of under- and over-crowding
  - Tackle tenancy fraud – Identify potential sub-letting, cuckooing, etc
  - Understand the level of disability
  - Awareness of the most common non-English communities

- **How collect?**
  - Collect data from new tenants
  - An annual census/survey of tenants and leaseholders
  - Utilise as many customer interactions as possible – contact centre; home visits; scheme events; contractors?
  - External company

- **How use?**
  - Tailor services appropriately
  - Influence the mix of property types on new build schemes
  - Influence allocations, lettings and transfer arrangements
  - Assess trends in complaints, ASB, etc
  - Assess the best ways to engage with residents and communities
  - Celebrate the diversity of your communities

- **Key actions**
  - Ensure staff are confident in explaining the need for data
  - Set targets to achieve full data set
  - Prioritise – no repairs reported in 12-month period, difficult to access for gas servicing; etc

- Complaints: As a priority, carry out a deep dive review into complaints management to ensure you are compliant with the HOS Code of Complaint Handling. There should be a particular focus on:
  - Identifying whether the Council is recording all relevant expressions of dissatisfaction as complaints
  - Ensuring all relevant staff understand the difference between service requests and expressions of dissatisfaction
  - Delivering wider training on effective complaints management across relevant teams
  - Completing a self-assessment against the Housing Ombudsman Complaints Handling Code, ensure appropriate governance sign off and publish on the Council website (and send a copy to the Ombudsman)
  - Ensuring learning from complaints is embedded into the complaints management process.
- Transparency: develop an information and performance information plan and publish performance information widely to tenants and staff (and on the Council website)
- Influence: Develop a *"wide range of meaningful opportunities"* for tenants – eg, in practical tasks such as checking voids or estate walkabouts (which were specific activities raised by tenant representatives we met on-site), not just in reading documents
- Consider opportunities to gain feedback from a broader range of residents including younger tenants and complainants (post-transaction surveys, online options, polls, etc)
- Accountability: Develop clear service standards in conjunction with tenants, publish and agree a reporting framework.

7   Neighbourhood and Community Standard

This standard focusses on the landlord's approach to shared spaces, working with stakeholders to ensure neighbourhoods are safe and how they tackle anti-social behaviour, hate incidents and domestic abuse. Satisfaction with the neighbourhoods and communities where people live is always high up the list of tenants' priorities. Social landlords must treat neighbourhood management seriously and ensure they have policies and practices in place to address resident concerns on ASB and on the way their estates and communities are managed more generally.

The standard covers the following specific areas:

- Safety of shared spaces
- Local co-operation
- Safer neighbourhoods
- Domestic abuse.

Overview

In HQN's opinion, the current position, as highlighted in the evidence provided, will not provide the level of assurance the Regulator (RSH) will be seeking to confirm compliance with this standard. In isolation, we would not expect the RSH to rate this standard any higher than a C3, especially in light of underdeveloped approaches to neighbourhood management, anti-social behaviour, including hate incidents, and domestic abuse.

We found the following key issues that need to be addressed to have confidence in compliance:

- Programmes for estate checks, such as for cleaning etc, look sound, our reality checks demonstrated some issues, which suggest a lack of consistently good service delivery

- Core housing and neighbourhood management strategies and policies are absent (or "in development") leading to a lack of consistency in delivery

- Housing management staff describe good interventions with tenants, but we found a lack of evidence to support this

- There is a need for a cultural shift to use data and customer insights to drive service improvements.

On a positive note, we found that staff demonstrated a good understanding of their localities and their services and showed a commitment to supporting tenants and communities well.

Safety of shared spaces

Although the definition of shared spaces specifically refers to land not owned by the provider (but which affects the peace and enjoyment of your tenants), it is taken as read that the Regulator will also assess the quality of neighbourhoods under the direct ownership and/or management of the provider. We have therefore included an assessment of the internal and external areas of your estates, as they clearly affect the satisfaction with services delivered and their overall experience of living in your homes.

We found that the Council has not undertaken any exercise to map whether it has any shared spaces as per the consumer standard definition. Staff were unable to identify areas where the Council manages homes, where there are spaces (indoor or outdoor) shared with tenants of other landlords – and thus no requirement to work with other landlords to promote safety. In response to HQN's draft report, the Council stated that *"We acknowledge that there is a line in the standards about working with RPs however, in our residential units, the other landlords are PRS landlords not RP."* In fact, the required outcome in respect of this standard refers to "other landlords" rather than specifically registered providers (RPs), so the requirement and expectations remain.

Although the standard lacks detail, we believe it refers to any land adjoining that owned by the Council, which may affect the peace and enjoyment of tenants. This could apply to land owned by other departments of the Council, registered providers or private owners. It reflects the need to engage with all relevant stakeholders.

Areas that might fall under this area could be play areas, parks and residential estates. The Council may play a dual role, via different departments, as landlord and Council (eg, on maintenance of shared areas, footpaths, etc). We recommend you consider how to involve the wider community in reviewing these spaces.

Our reality checks identified some issues in the Council's communal areas, including overgrown pathways and grassed areas. We were advised that these are not the responsibility of the housing service. However, whether the responsibility rests with another department or not is of little interest to tenants, who simply want well-maintained, attractive and safe environments. Nor is it likely to be of particular interest to the Regulator, who will want to know what the housing service is doing to ensure that expectation is delivered.

We noted low tenant satisfaction scores in respect of communal cleaning and maintenance and this mirrored our experience, where we saw poor external standards (such as grass cutting, pathway maintenance, grounds, fly tipping).

The two photographs below were examples we came across – of a lack of attention to detail and the presence of fly-tipping despite the installation of new bin stores.

Local area co-operation/safer neighbourhoods

Staff HQN spoke to reported good co-operation with key stakeholders around managing anti-social behaviour (ASB) but were not able to identify any other work to promote social, environmental or economic well-being in areas where the Council has social housing. We suspect there will be areas where the Council co-operates in these areas (and we were advised that the Council provides information in regular newsletters) and recommend reviewing corporate workstreams to consider their relevance to tenants and social housing. This can then be built into any self-assessment or supporting documentation provided to the Regulator.

There is an opportunity to draw together these existing messages (or clarify messages) to communicate how the Council uses its housing stock to meet its strategic objectives, eg, in reducing homelessness or promoting wellbeing for older people

The housing service has an ASB policy (though the website version is dated 2017), but it differs from the Council's policy. This could be confusing for tenants reporting ASB. For example, it appears that there are different thresholds for intervening, The corporate policy expects people to log issues for a period before asking for help, whereas the housing ASB team offer early advice. While the Council has a range of tools to assist in managing ASB, such as noise recording equipment, we were advised that these are not always available. We note that while you can report ASB online, the way the website is laid out is confusing and people may not spot that this is possible.

Our review of the ASB IT system noted that record keeping and communication to tenants is a positive, but highlighted challenges in linking in with other data and systems. We found evidence during site visits of ASB impacting on communities and staff advised us that there was an impact on the letting of low-demand properties. This is no surprise and – to a degree – is to be expected. However, the Regulator will expect you to be able to set out what your plans are to address such issues.

There is no neighbourhood management policy or service standards currently in place, though following our on-site work, we were provided with a draft neighbourhood management strategy. It sets out a general approach to management of neighbourhoods, but it does not contain any service standards, so there is little ability for tenants to use it to assess whether the Council is meeting its obligations or offer. While there is a reference to performance monitoring and to working with stakeholders, these areas are light in terms of detail. There is also no reference to the relevant Tenant Satisfaction Measures. On a positive note, the strategy suggests a zero-tolerance approach to items in communal areas, though it is light on what the Council does where it comes across such items.

We recommend you consider reviewing the boundaries of ASB and general housing management functions to ensure that ASB is tackled promptly. We stress that we did not find evidence that ASB is not tackled promptly, but officers reported a lack of traction where other departments are involved.

We found issues on estates tended to be low level and linked to children playing and making noise, often because of a lack of space in homes (that is families in flats). We noted that some consideration has been given to this issue, including a reference to a neighbourhood management policy in the consumer standards action plan and a target to let flats to smaller households and diversification of offers. We also found that learning from incidents to develop services and train staff was under-developed.

The consumer standard specifically references hate incidents. Staff were unable to recall any incidents of hate crime (and there were no logs to identify any such incidents). We note from the website that there is a racial harassment policy and procedure but it is very old (2005). We were also provided, after the feedback session, with a copy of the Council's hate crime policy. However, this is undated so it is unclear whether it is current, old or a draft. We recommend undertaking a review of this area of service, in consultation with relevant stakeholders, such as the police, relevant corporate teams, and with tenants. We further recommend the promotion of available services and support to tenants.

Domestic abuse

There is very little information on the Council website in respect of domestic abuse (DA) and nothing specific to council tenants. Staff appeared to be unclear on their role in relation to DA. There are no current relevant housing policies, which is likely to lead to inconsistency in delivery. We were provided with a draft policy following our feedback. As with other draft policies we were provided with, the Council needs to ensure this reflects current practice, is signed off by the relevant governance framework, trained out to relevant staff and promoted to tenants. While we note that staff attend MARAC meetings, the lack of a policy, procedure or any guidance means that there can be little confidence that people reporting DA will receive a comprehensive and consistent level of support or that officers will understand the approach to support, managing joint tenancies, rehousing options, etc.

We found that individual staff members have relationships with relevant agencies for referrals, but there is no formal pathway. We noted that work towards Domestic Abuse Housing Alliance (DAHA) accreditation is highlighted on the consumer regulation action plan, but this is (apparently) only in respect of homeless services

Conclusions and key priorities

Overall, we found that the Council may struggle to provide the assurance the Regulator will be looking for in respect of the neighbourhood and community standard and much work is required on policies and procedures, training to ensure the services are delivered consistently and well, and that the Council needs to set out the outcomes of what it has achieved.

We set out the key priorities for the Council as follows:

- Develop, consult on, publish and implement key policies – especially:
  - Neighbourhood management policy
  - ASB in housing
  - Domestic abuse
  - Hate crime.
- Ensure the above policies are supplemented by clear procedures, which are trained out to relevant colleagues

- Develop and consult on service standards for neighbourhood management including key estate services, such as cleaning, grounds maintenance, pathways
- Deliver staff training on the above – with support to develop skills
- Consider appointing service leads for key areas such as DA, who can acquire additional, specialist knowledge and support others in the team.

8   Tenancy Standard

This standard focuses on landlords offering appropriate tenancies and making best use of their housing while allocating homes in an equitable, efficient and effective way. It places a greater emphasis on tenancy sustainability than in the previous version of the standard, including managing mutual exchanges and dealing with tenancy fraud. In a nutshell, it focusses on the tenant journey from beginning to end.

The standard covers the following specific areas:

- Allocations and lettings
- Tenancy sustainment and evictions
- Tenure
- Mutual exchange

Overview

In HQN's opinion, the current position, as highlighted in the evidence provided, will not provide the level of assurance the Regulator (RSH) will be seeking to confirm compliance with this standard. In isolation, we would not expect the RSH to rate this standard any higher than a C3, especially.

We found the following key issues that need to be addressed to have confidence in compliance:

- While officers are committed to supporting tenants to maintain tenancies, there is a lack of rigour in monitoring activity. For example, there is no analysis (including by diversity) of lettings to determine the effectiveness of policies
- There are key strategies and policies missing – without these, it is impossible to demonstrate that you are delivering against your commitments. Actions identified in the consumer standard action plan need to be expedited/resource allocated to delivery
- While consumer standards focus on tenant services – value for money is important too. Poor void turnaround times means homeless families waiting longer in temporary accommodation and less money is available to spend on services to tenants.

Reality checks

We visited vacant properties to assess the quality of homes that are deemed to be ready to let. We found several issues relating to, not just quality, but also security, accessibility and safety.

We did not see a (published) lettable standard and therefore it was unclear to HQN what your approach is to decorating properties, replacement of blown window panes, maintenance of gardens, or safety considerations, including responsibility for the provision of gas safety certificates and Energy Performance Certificates. The following are photographs of some of the issues we found.

Although we were advised that there was no lettable standard in place, we were provided with one following our feedback session, along with a version to be given to prospective/new tenants. However, the version provided to tenants is limited in scope and does not allow a prospective tenant to assess to any extent whether the lettable standard has been met.
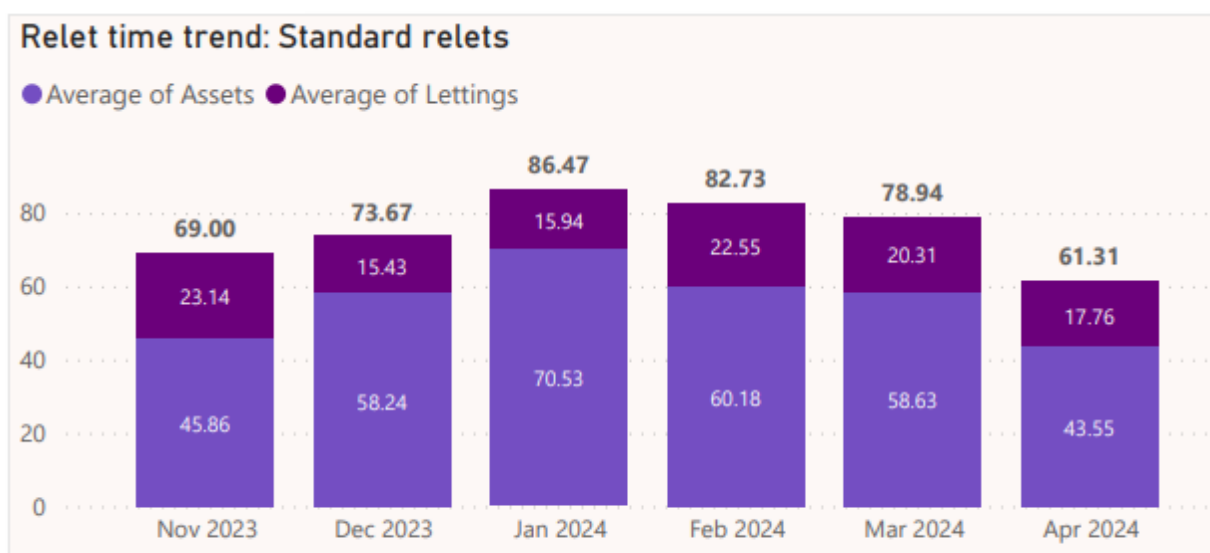
Allocations and lettings (including mutual exchange)

There is an allocations policy in place, but there is little or no monitoring of its impact, for example by relevant protected characteristics.

Performance in managing works to and letting of vacant properties is significantly below good performance. We were provided with performance information (see graphic below), which suggests that the vacant property contractor is not performing to anything like acceptable standards, with the average time a vacant property was in maintenance between November 2023 and April 2024 ranging from 43.55 days to 70.53. This contributed to average re-let times ranging from a monthly average of 61.31 days to 86.47 days. According to the performance report, this also led to a vacant property loss for the period of £382,000. During the same period there was also a loss of rent on new build properties of £107,000. We would expect overall re-let in a high-performing service to be in the vicinity of 20 days.

Relet time trend: Standard relets
● Average of Assets ● Average of Lettings

Month	Average of Assets	Average of Lettings	Total
Nov 2023	45.86	23.14	69.00
Dec 2023	58.24	15.43	73.67
Jan 2024	70.53	15.94	86.47
Feb 2024	60.18	22.55	82.73
Mar 2024	58.63	20.31	78.94
Apr 2024	43.55	17.76	61.31

The Council does offer a mutual exchange service and this is advertised. We were provided with evidence of take-up. We note that the consumer standards action plan identifies need for further promotion of mutual exchange to tenants.

Tenancy

We were advised that there was no current tenancy strategy or policy in place, the latter being required by law since 2013, to underpin your approach to the use of introductory, secure and non-secure tenancies. However, we were subsequently provided with a strategy developed in conjunction with neighbouring authorities. However, the strategy "expired" in 2023. We were also provided with a draft new strategy, though it is essentially – with the additional of a section on the new regulatory framework – a repetition of the old strategy. It therefore requires updating (for example with stock data for providers) and the usual consultation and governance sign offs.

Tenancy sustainment and evictions

It was clear from our interviews that staff are committed to tenancy sustainment. There are some positive commitments and procedures in place in relation to new tenant visits and support during first year of tenancy. There is a programme of three yearly checks in place – for tenancy audit and support – but the Council still has a post-Covid backlog in place. We were not provided with data on numbers of visits undertaken. The Regulator is not likely to accept the pandemic as a reason for under-performance, given the passage of time.

It is not clear what the Regulator's position is on the preferred regularity of visits to all homes, but it is likely to be influenced by the level of accurate data a provider already holds. We recommend an audit programme of no more than two years, where resources allow and ideally an annual programme. We certainly recommend the targeting of visits based upon a set of priorities such as the following:

- Risks – eg, tenants known to be vulnerable and/or in contact with support agencies
- Those in higher levels of rent arrears
- Properties where no repairs have been reported in a 12-month period
- Properties where multiple repairs have been reported
- Date of last visit – targeting oldest first
- Focus on achieving 100% in areas of ASB/low demand/high need.

We found a lack of proactive measurement of the success of tenancy management and sustainability, for example, reporting on the number of tenancies ending within 12 months of start date; average tenancy length by protected characteristic; number of and reasons for evictions. This can support learning and enable the Council to target resources appropriately.

Staff reported they have had very few cases of tenancy fraud. There is a perception that it does not happen. However, while identification is requested at letting stage, it is not requested at tenancy audits and therefore there is a risk that current tenants could be sub-letting their properties. Equally, the lack of a comprehensive tenancy audit programme means the Council cannot be sure that the risk of tenancy fraud is managed or mitigated. There may well be limited tenancy fraud in existence, but the Council should still have a robust approach to tackling the issue, both at letting stage as well as during the life of a tenancy, and especially in cases where a tenant has applied for the Right to Buy.

Conclusions and key priorities

Overall, we found that the Council may struggle to provide the assurance the Regulator will be looking for in respect of the Tenancy Standard and much work is required on policies and procedures, driving down average re-let times and that the Council needs to set out the outcomes of what it has achieved.

We set out the key priorities for the Council as follows:

- Review the lettable standard for vacant properties in consultation with tenants to ensure it meets positive practice and the tenant-facing version enables prospective tenants to assess whether a property meets the standard

- Carry out an end-to-end process review of the vacant property process, from tenant giving notice, to sign up, to identify pinch points and delays

- Use the above to develop a focussed action plan to improve the whole vacant property process and set targets to reduce the time properties are in maintenance and the overall average re-let times. Set a realistic but challenging target to reduce re-let times by at least 50% in the first instance, then to achieve top quartile performance

- Complete the process for consultation and governance sign off of the tenancy strategy and policy

- Develop a suite of performance indicators to assess whether the Council's allocations policy and process is meeting expectations and priorities, including around EDI and other aspects. There is the potential to use this data to develop a low demand strategy too

- Implement a process for carrying out and assessing the success of tenancy support visits, by priority areas, as identified above, and use to prioritise resources

- Develop a tenancy fraud policy and process to mitigate the risk that homes are not being occupied (or being bought by) those that are not entitled to.

9 Concluding thoughts

We found colleagues that we spoke to engaged in the process and keen to understand areas for improvement. However, while some building blocks are in place, there is much work needed to have confidence that the Council is compliant with the consumer standards and could provide the necessary assurance to the Regulator.

Key priorities for action are:

- Take urgent action to address identified areas of concern – especially safety and quality and complaints management

- Establish a clear plan for the collection, analysis and use of household data

- Update the social housing regulation action plan with target completion dates and monitor progress

- Prioritise other areas for action – in the event of an early inspection, be in a position where you can show you have identified challenges and targeted resources to them

- Ensure effective leadership to make progress on key areas especially safety

- Review the need to instil the appropriate culture and system change required to give staff the tools and skills they need to deliver services based on data.

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