Consumer Standards: Self-Assessment Feedback

October 2023

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Agenda

- Description of proposed Consumer Standards
- Social Housing Regulation Act (timeframes/next steps)
- Rationale for the Self-Assessment
- Standard 1: Safety & Quality
- Standard 2: Tenancy
- Standard 3: Neighbourhood and Community
- Standard 4: Transparency, Influence and Accountability
- Conclusion/Next Steps
- 'Asks' of Compliance Board

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Proposed Standards- Consultation (17th October 2023 end date)

The Transparency, Influence and Accountability Standard	The Neighbourhood and Community Standard	The Tenancy Standard	Safety and Quality Standard
• Engagement structures • Diversity • Communication and accessibility • Complaints management • Fairness and respect	• Managing communal areas • Co-operation and local partnerships • Safety and anti-social behaviour • Domestic Abuse	• Allocations • Tenancy & Lettings • Sustaining tenancies • Right of tenure • Mutual exchange • Preventing evictions	• Landlord H&S compliance • Decent Homes Standards • Stock condition/intelligence • Repairs • Aids and adaptations

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Social Housing Regulation Act (timeframes/next steps)

- Received Royal Assent in July 2023, following government promises post Grenfell
- Consultation with the sector on proposed Consumer Standards (until 17th October 2023)
- Consultation on new fee structure to support infrastructure around the new regime (until 30th October 2023)
- Moving from reactive regime to proactive regime-inspections starting in April 2024, based on first round of TSM data
- Housing Ombudsman Paragraph 49 report issued in January 2023
- Regulatory Notice issued in May 2023

Regulator of Social Housing

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Rationale for the Self-Assessment

Self-assessment has been undertaken based on the Regulator of Social Housing's key principles for regulation

1 Social Housing is well managed	**6** Landlords comply with tenancy law and avoid unnecessary evictions
2 Complaints are dealt with fairly and effectively	**7** Tenants have access to information
3 Tenants and treated with fairness and respect and their diverse needs are taken into account	**8** Tenants can influence decisions and priorities
4 Housing meets the decent home standard	**9** Landlords take tenants' views into account
5 Housing meets Health and Safety standards	**10** Landlords work with other agencies to enhance the safety and wellbeing of the area

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Assessor Principles

- Assessment was undertaken based on the new proposed Consumer Standards; these are different to the original self-assessment undertaken in November 2022

- Assessment toolkit was developed jointly with colleagues from 4oc and Campbell Tickell, taking into consideration comments from ARCH and the Housing Ombudsman

- Assessment was undertaken through the lens of the Regulator of Social Housing, based on the evidence provided and does <u>not</u> take into consideration anecdotal comments where this cannot be clearly supported by evidence

- Assessment gives the Council a baseline understanding against the new standards, it is not a full mock inspection but does incorporate many aspects of what this might entail.

- Both residents and staff were invited to engage in focus groups in this assessment (random selection, representative of tenant base and archetype)- incorporating data from recently completed TSM surveys and complaints information

- Assessment was undertaken by the Strategic Enabling team, who are impartial and not aligned to any of the operational service areas within City Housing

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Calculating Risk

High-Risk
- Level of non-compliance would constitute a breach of the proposed Consumer Standards
- Significant risk to life/resident's safety
- Could cause severe reputational damage to the organisation
- Significant distress or inconvenience to residents

Medium Risk
- Level of non-compliance may constitute a breach of proposed Consumer Standards
- Could cause moderate reputational damage to the organisation
- Some distress or inconvenience to residents

Low Risk
- Generally, compliance with the proposed Consumer Standards (with some minor recommendations)
- Opportunity to improve the reputation of the organisation
- Opportunity to enhance the experience of residents

Standard 1: Safety & Quality

The standard has13 specific expectations attached, 4 areas were assessed as low-risk, 4 areas were assessed as medium risk, and 5 areas were assessed high-risk

Score	Total
Low	4
Medium	4
High	5

High Risk:
- Compliance against Decent Homes standards
- Low levels of stock condition data
- Compliance against landlord H&S standards
- Outdated/inefficient SOPs and IT systems
- Poor data assurance across several H&S areas

Medium Risk:
- Unused monitoring information (repairs)
- Repairs QA process
- Record keeping and recruitment
- Contractor performance- KPIs not tested

Low Risk:
- Awareness of aids and adaptations processes
- Record keeping (adaptations)
- Monitoring of communal repairs
- Communication with residents (repairs)

# Standard 1: Safety & Quality

Positives

- Significant acceleration of landlord H&S programmes since April 2023
- Circa 2400 stock condition surveys completed since December 2022, an additional 6,000 surveys procured
- Asset Management Strategy and HRA Business Plan developed and geared towards Decent Homes
- RAG rated stock portfolio to target investment using a risk-based approach
- QA process developed for the repairs service, following Paragrah 49 report
- Agreement to embed True Compliance IT system

Risks
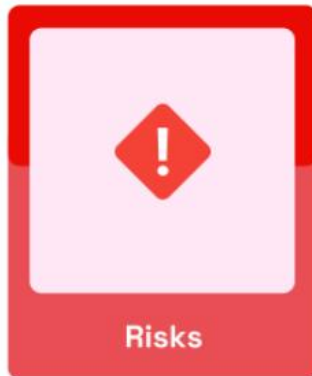
- Decent Homes Standards will take a minimum of 7 years to achieve (current standard only)
- 2400 stock condition surveys undertaken based on an inaccurate specification
- s.151 delays- significant investment will still be required to accelerate landlord compliance programmes, concerns around losing pace
- 100% physical stock condition surveys will take investment away from resident's homes, to fund the programme
- Capacity of the repairs team to undertake QA work is limited- no standard embedded processes

Recommendations
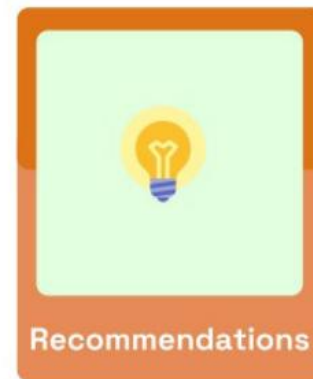
- Accelerate stock condition programme, aiming to achieve 20% per year over 5 years
- Embed QA process for repairs, supported by S&E team to improve capacity
- Implement true compliance to ensure there is accurate data across all landlord H&S areas
- Launch Asset Management Strategy & HRA Business Plan
- Accelerate all landlord H&S compliance, including accurate recording of remedial actions
- Review and update all SOPs across the service area

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Standard 1: Safety & Quality (Qualitative Data)

Residents

'Not difficult to report a repair but the outcome is never achieved'

'Repairs are always a short-term fix; I don't bother to call anymore.'

'Properties should be maintained from the start so we wouldn't need all these repairs'

'I feel okay in terms of the level of safety in my home'

'Contractors literally put cards through the door but never actually knock.'

Staff

'If we don't invest in stock, there is a knock-on impact on repairs, and we suffer from this'

'We have backlogs in lots of complex work areas- comparing asbestos and EICRs is like comparing apples and pears'

'Changes in appointments always leads to repairs, we need a Deliveroo type system..'

'Tenant expectation is very high vs the quality of service, we will never achieve what they want'

'We have put forward business cases for years that never go anywhere'

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Standard 2: Tenancy Standard

The standard has 18 specific expectations attached, 8 areas were assessed as low-risk, 8 areas were assessed as medium risk, and 2 areas were assessed high-risk

Score	Total
Low	8
Medium	8
High	2

High Risk:
- Strategic Tenancy Policy is out of date is not followed operationally
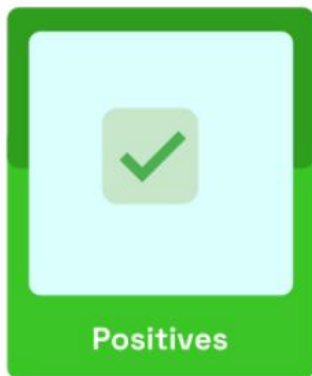- Evidence that incorrect tenancies have been issued and not updated- secure tenancies on PSL properties etc.

Medium Risk:
- Mutual exchange policy to be updated
- Lettings Policy to be launched
- Review website re mutual exchange
- Decant Policy to be reviewed- missing info
- Record keeping and monitoring processes
- Lack of proactive visits- missed opportunities
- TOM implementation
- ASB Policy to be launched

Low Risk:
- Sales record keeping (CORE)
- Review of extended introductory tenancies
- Wisemove awareness/advertising
- Homeswapper awareness/advertising
- Housing Management visiting checklist- encouraging proactive conversations
- LLPs- utilise more effectively
- Monitor and review RSL nominations
- Best use of stock project

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Standard 2: Tenancy Standard

Positives

- Allocations Policy is clear and sets out how households are prioritised, in a transparent and open way
- Adapted properties are clearly visible within the shortlisting process
- Wisemove and Homeswapper are both advertised and relatively well used- an opportunity to deliver more through these initiatives
- Lettings are accurately recorded on CORE
- New Lettings Policy is now being implemented and going through sign off processes

Risks
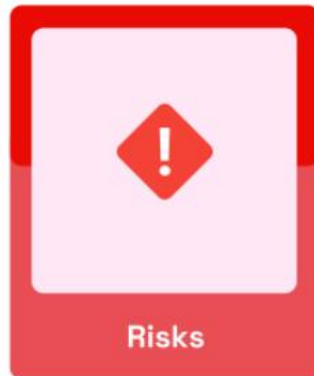
- Limited monitoring of tenancies- secure tenancies have been awarded when these should have been fixed term and vice versa
- Lack of governance of the Strategic Tenancy Policy means there is no evidence tenancies are monitored in practice

Recommendations
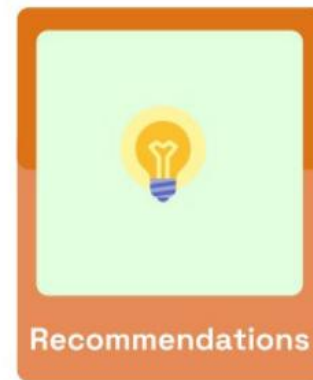
- Undertake full audit of tenancies, particularly fixed term and secure to ensure these are appropriate and well monitored
- Update Strategic Tenancy Policy and ensure there is a governance structure to review this
- Launch new ASB Policy post consultation
- Review Decant Policy
- Update Mutual Exchange Policy- and website with missing information
- Ensure that tenancies are monitored through the duration of the tenancy and not just at 'sign up'

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Standard 2:Tenancy Standard

Residents

'I don't get the Allocations Policy, people talk about right to buy but I don't know what it means or if I can access it.'

'I tried to transfer but I can't use online and had no-one to help me, it is so difficult to understand'

'I know about mutual exchange but wouldn't know where to start'

'I had a really useful officer in the Allocations Team when I applied'

'I can't go to the Neighbourhood Offices to get help anymore because they have closed'

Staff

'Tenants don't always know who to call and it can be difficult for them'

'There is support at the beginning of the tenancy but after that everything goes online and there is very little face to face contact. This goes for all tenants, no matter what their situation is'

'Preventing eviction panel does work really well, some households definitely would have been evicted if we didn't do this'

'No incentive to move, if you are elderly why would you want to go in to high-rise sheltered, makes no sense'

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Standard 3:Transparency, Influence & Accountability Standard

The standard has 20 specific expectations attached, 6 areas were assessed as low-risk, 4 areas were assessed as medium risk, and 10 areas were assessed high-risk

Score	Total
Low	6
Medium	4
High	10

High Risk:

- Lack of tenant visits
- Disengaged staff- particularly Housing Management teams
- Diversity and accessibility needs
- Consistency- engagement is not embedded citywide
- Service standards missing in several areas
- Community initiatives, seen as voluntary rather than part of the role
- Complaints management
- TSM position- significantly lower than national average
- Communication and transparency
- Lessons learned- involving tenants

Low Risk:

- Minor amends- complaints policy
- Launch annual report 2022/2023
- Launch online TSM survey
- Submit TSM data (April 2024)

Medium Risk:

- Self-referral to the RSH to be discussed as part of standard governance
- Housing to be added to BRUM account
- Communication preferences audit

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Standard 3: Transparency, Influencing and Accountability

Positives

- TSM baseline survey undertaken, Housemark procured as an independent adviser for Q1/Q2- ensuring online and telephone option
- Re-engineering engagement events facilitated by TPAS across a 6-month period to support new structures
- Meet the Ombudsman event
- Links with Poverty Truth Commission, Citizens UK and Fair Housing Birmingham as consultation partner for strategy & policy
- Agreed experts by experience model- embed via Compliance Board

Risks
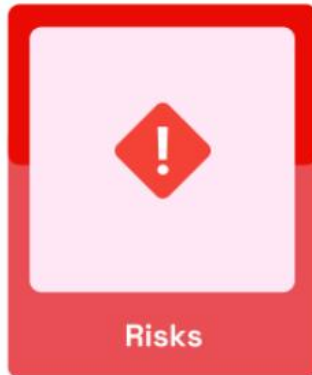
- Disengagement and cultural concerns within the Housing Management function
- TOM model needed to truly embed proactive engagement
- Communication preferences and diversity needs not understood
- Lack of tenant visits and overall face to face interaction
- Time delay around delivering the recommendations from the TPAS review
- Engagement structures are still not representative of tenant base

Recommendations
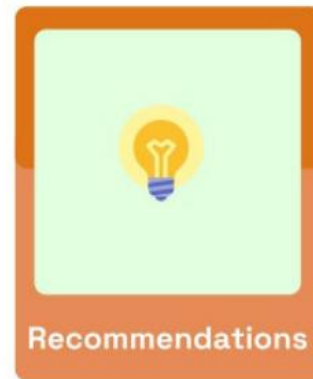
- Management accountability for feeding in to 'you said, we did' report following TSM feedback
- Complaints performance must continue to stabilise and improve
- Framework for proactive visits, with clear KPIs across each area
- Audit of communication preferences and diversity needs
- Milestone plan for TPAS review, setting out clear deliverables and levels of accountability
- Implement the TOM across all areas, but particularly Housing Management

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Standard 3: Transparency, Influencing & Accountability

Residents

'I haven't received any support; I wouldn't even know where to get it.'

'I don't trust the Council and know that I haven't been treated fairly.'

'Nobody comes back to you when you make a complaint, it just gets ignored.'

'I have made multiple complaints about contractors and just never get any proper answer, fobbed off…'

'Housing officers should come into the area and houses more; it would go a long way with us'

Staff

'Tenant engagement is for everyone to do and not just the TPOs'

'There are 164 language, teams try their best..'

'We need to understand the cultural norms, for example we had a resident from Sudan who set fire to his sofa to keep warm…this was normal where he was from'

'We support well up until 12 weeks, but I am sure what comes after that'

'Really poor in terms of taking complaints and answering them in isolation… removed from the service'

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Standard 4: Neighbourhood & Community Standard

The standard has 9 specific expectations attached, 2 areas were assessed as low-risk, 4 areas were assessed as medium risk, and 3 areas were assessed high-risk

Score	Total
Low	2
Medium	4
High	3

High Risk:
- Poor response and resident satisfaction re ASB
- Communication around safety
- Prompt action and intervention

Medium Risk:
- Signposting options and referrals in to support services
- Targeted approach to hate crime, in policy and on the ground
- Visits, practical initiatives and overall general f2f interaction with tenants that is proactive rather than responding to a problem
- Resolving actions derived from estate audits

Low Risk:
- Continue working towards achieving DAHA accreditation
- Think Family model and specialist DA services

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Standard 4: Neighbourhood & Community Standard

Positives
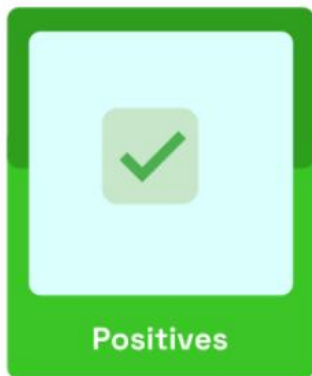
- Think Family Model and work towards DAHA accreditation, provides a platform to support vulnerable households
- Strategic link with NAIS and EI&P, supports a focus on a more localised model
- Work with BVT in relation to the development of a Neighbourhood Management Strategy and pilot
- New ASB policy in development, focusing on a more proactive approach

Risks
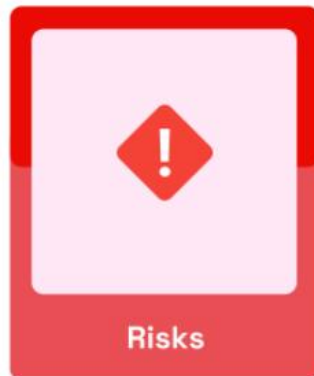
- Handoffs across the service in relation to ASB- structural issue to be addressed via the TOM
- KPIs and Power BI shows poor performance across the board on ASB interventions
- No safety plans in place
- Residents feel that CCTV and security is required
- Lack of frontline engagement in community-based initiatives- visits, regen, complaints management etc.

Recommendations
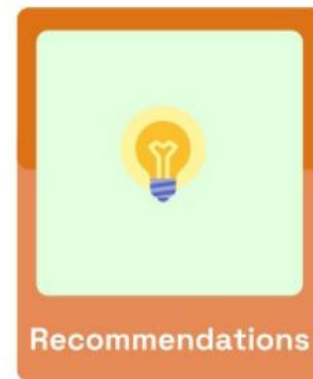
- Immediately improve response to ASB reports- through embedding safety plans in hot spot areas
- Stronger leadership across the service in relation to ASB monitoring and reporting
- CCTV strategy to be developed
- Implement new TOM, supporting a more user-friendly structure for residents
- More effective collaboration with police, community safety etc.

Standard 4: Neighbourhood & Community Standard

Residents

'Complained about drug users upstairs and basically asked to do detective work, doing the job for them…'

'Constantly changed officers and had to start all over again every time'

'Children weren't safe due to constant undesirable people in the building'

'When we report ASB, we want to know what happens after because we are usually scared or at least worried and we never get the outcome'

Staff

'We need CCTV back; we aren't protecting out asset or our people without it.'

'Continual ASB and damage is a regular cause of repair in communal areas'

'Liaison officers used to have really good knowledge of tenants can we get that back?'

'We do reactionary work with tenants but don't always go back to them to let them know what is going on'

'We are getting more reports and doing more analysis which helps us to put things right'

Conclusion

- There is understanding, oversight and commitment at DMT level to address areas of non-compliance across the board

- Some significant areas of risk but no surprises

- Data is improving all the time; Power BI provides several key reports and areas of visibility, this is a tool that can genuinely be used to manage performance if better utilised

- The Council are catching up- compliance is going to take a long time to address, transparency with both the Regulator and Ombudsman is imperative whilst we work through this.

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