

Title: Consumer Standards – self-assessments

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1. Background

- 1.1. The government's [Consumer Standards](#) set the outcomes that social landlords must deliver for tenants in terms of quality of homes and services they provide to tenants. Following government consultation updated Consumer Standards took effect from 1 April 2024.
- 1.2. A key part of the Social Housing (Regulation) Act has been to empower the Regulator for Social Housing (RSH) to apply more proactive regulation of the Consumer Standards.
- 1.3. The four updated Consumer Standards are as follows:
 - **Safety and Quality Standard** – requirement to provide safe and good quality homes and landlord services to tenants.
 - **Tenancy Standard** – requirement for the fair allocation and letting of homes and how tenancies are managed and ended by landlords.
 - **Transparency, Influence and Accountability Standard** – requirement to be open with tenants and treat them with fairness and respect so that tenants can access services, raise complaints, influence decision making and hold the landlord to account.
 - **Neighbourhood and Community Standard** – requirement to engage with other relevant parties so that tenants can live in safe and well maintained neighbourhoods and feel safe in their home.
- 1.4. Each Standard is broken down into a number of 'Required Outcomes', which set the broad outlines that each Standard requires. Each outcome is then broken down further into 'Specific Expectations', which give more detail on what landlords must do to meet each Required Outcome.
- 1.5. Whilst the Consumer Standards have been in place for some time, the Act has created strengthened and more proactive regulation of the application of the Consumer Standards. The Act sets out a 'co-regulatory' model which requires landlords to their own compliance against the standards, ensuring that an open and transparent approach is taken which hears the customer voice. If a landlord assesses that they may not be compliant with any of the Consumer Standard required outcomes that they notify the RSH. Compliance with the Consumer Standards also then forms a significant part of any RSH inspection.

2. The Consumer Standards

2.1. More detail of each of the requirements of the four Consumer Standards are outlined below.

2.2. The Safety and Quality Standard

2.2.1. The Safety and Quality Standard puts in place the standards we must meet in terms of ensuring the safety and quality of tenants' homes.

2.2.2. It covers the quality of our housing stock and how we keep up-to-date, accurate records of that stock, how we must ensure the health and safety of tenants, how we deliver repairs, maintenance and planned improvements and adaptation to homes where they are needed.

2.3. The Tenancy Standard

2.3.1. The Tenancy Standard outlines how landlords must fairly let their homes and how tenancies are managed.

2.3.2. It requires that landlords allocate and let homes transparently and fairly and takes the needs of tenants and prospective tenants into account, how we support tenants to maintain their tenancies, specifies that our tenancies must be compatible with the purpose of the accommodation, the sustainability of the community and the efficient use of housing stock, and how we support tenants to make mutual exchanges if they wish to do so.

2.4. The Transparency, Influence and Accountability Standard

2.4.1. The Transparency, Influence and Accountability Standard sets out how landlords must treat tenants with fairness and respect and be open with them.

2.4.2. It sets out how landlords must take tenants views into account when making decisions, how they must communicate and share information with tenants so they know the level of service they can expect and hold landlords to account, the performance information (including TSMs) landlords must collect and share to ensure effective scrutiny of performance, and how complaints must be dealt with fairly, effectively and promptly.

2.5. The Neighbourhood and Community Standard

2.5.1. The Neighbourhood and Community Standard sets out how landlords should work with other organisations to ensure that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.

2.5.2. It specifically covers the safety of shared spaces (non-landlord land which forms part of the local environment and community), how we work with partners to promote the social environmental and economic wellbeing of communities, and how landlords must work with partners to tackle Anti-Social Behaviour (ASB), hate crime and domestic violence (DV).

3. Monitoring our Compliance with the Standards.

- 3.1. In January we reported to the Leeds Housing Board that self-assessments were being undertaken of our compliance with the Consumer Standards. We reported the proposed self-assessment approach and the outcome of a self-assessment against the Tenancy Standard, for which the self-assessment approach had been trialled. The Board supported the self-assessment approach and the outcome of the self-assessment of the Tenancy Standard.
- 3.2. Since the January Board Housing Leeds has undertaken self-assessments against the remaining three standards, also incorporating changes to the Standards which took effect in April and refreshed its self-assessment against the Tenancy Standard.
- 3.3. We have put in place robust leadership to overseeing our compliance with the Consumer Standards, with Head of Service Leads for each of the Consumer Standards as follows:

Safety and Quality Standard – Adam Crampton

Tenancy Standard – Mandy Sawyer

Transparency, Influence and Accountability Standard – Mandy Sawyer

Neighbourhood and Community Standard – Mandy Sawyer

Heads of Service are responsible for overseeing any self-assessments and remedial actions to strengthen compliance, but also responsible moving forward for overseeing ongoing compliance with the standards.

- 3.4. In completing the self-assessments we undertook a detailed and challenging self-reflection, not just of our overall compliance with the standard, but also considering the extent that we are able to evidence our compliance on the following and opportunities for continuous improvement:
 - **Strategy/Policy/Process** – is there an approved strategy or policy and process is available to evidence our approach in complying with the required outcome, is it up to date, and are there clear processes / guidance available for staff to support them in meeting the expectation?
 - **Quantitative and Qualitative Data** – what data is available to evidence our compliance with the expectation, what quality assurance arrangements are in place to evidence its accuracy, how is the data used and do we collect ongoing customer feedback and use this to improve?
 - **Openness and Transparency** – is the policy published and were customers involved in developing the policy development, how is the policy and our compliance communicated to tenants, how do we report our compliance within LCC governance frameworks.
- 3.5. Each specific expectation of the standard was assessed using a RAG rating to determine the extent of compliance as follows:
 - Red – potentially non-compliant
 - Amber – minimum compliance with improvement opportunities

- Green – robust compliance

4. Self-assessment Outcomes

4.1. A summary of the self-assessment outcomes is outlined in the table below:

Consumer Standard	Number of Specific Expectations	RAG ratings		
		Green	Amber	Red
Safety & Quality	12	5	6	1
Tenancy	18 (two are non-applicable to LCC because we don't use fixed-term tenancies)	12	3	1
Transparency, Influence and Accountability	23	9	11	3
Neighbourhood and Community	9	6	3	0

4.2. A summary of the outcome of the self-assessments against each Consumer Standard and suggested actions are outlined below:

4.3. **SAFETY AND QUALITY STANDARD**

4.3.1. Of the twelve expectations within this Standard, we assessed ourselves as compliant with eleven and assessed one expectation where we are potentially non-compliant. Of the eleven compliant expectations, six were identified as needing further work/improvement in order to achieve robust compliance.

Areas of Robust Compliance

4.3.2. As a large landlord we have the benefit of specialist officers in place to oversee our health and safety compliance, such as dedicated fire safety officers, gas and electrical safety teams, meaning that we have robust compliance with the application of health and safety legislation. We have also robustly applied the requirements of the 2022 Building Safety Act for 121 high risk buildings in our ownership. We have a well-established repairs and maintenance service, with robust contract management arrangements in place, offering a range of opportunities for tenants to report a repair. As a local authority landlord we are well connected into zero carbon ambitions of the city and region, delivering energy efficiency home improvement programmes at scale, including the use of innovative technologies.

Areas of Improvement Identified

4.3.3. **Stock Quality and Decency** – we identified a potential area of non-compliance relating to the 'Stock Condition and Decency' expectations. Whilst we hold varying levels of stock condition data on all our stock, only

74% of our stock has received a stock condition survey in the last 5 years. A proportion of these surveys have been 'elemental' as opposed to full stock condition surveys and so there is a risk that our knowledge of the condition of our stock is not sufficient to meet this expectation. A strategy was put in place prior to COVID to increase the rate of surveys but this was disrupted by COVID and remobilisation plans which meant that resources were diverted for a period into reducing the backlog of voids and repairs. Our current stock condition approach targets 20% of stock being surveyed on an annual basis (i.e. 100% of stock on a 5 year rolling programme). Although this target has been broadly achieved for the last 2 years, we are currently reviewing our surveying approach and plan to accelerate stock condition surveys to achieve 100% surveys within the next 2 years by utilising additional capacity over this period. This includes a review of our approach to communications, appointments and planning in order to reduce levels of no access, which currently stands at around 30%. In addition, integration with other internal and external partner systems has identified some flaws in data transfer that need to be resolved. Actions are however already underway to strengthen integration between Council and contractor systems so assist with simplified and robust transfer of stock condition data.

4.3.4. **Health and Safety** – whilst robustly complying with Health and Safety legislative responsibilities we identified improvement opportunities in the 'Health and Safety' expectations. Whilst the delivery of health and safety activities is robust, a number of policies relating to these activities require updating including the overarching Asset Management Strategy. There is also a need for strengthened performance management arrangements where services are delegated to internal service providers, e.g. cleaning. A number of urgent policy reviews are also underway to produce updated health and safety policies and procedures during 2024 which will be published to customers. Work is also planned for us to review service level arrangements where landlord services are provided by other council teams or managing agents, to ensure that service standards are reviewed with customer engagement and that these standards along with performance is more robustly reported to customers.

4.3.5. **Repairs, Maintenance and Planned Improvements** – again, whilst fully meeting our legislative responsibilities we identified improvement opportunities in the 'Repairs, Maintenance and Planned Improvements' expectations. We identified that we could be more robust in our assessment of tenant vulnerabilities at the point of repairs reporting to ensure that the repairs service is accessible to all customers. We also identified that there are opportunities to improve our ongoing communications with customers where follow-on or multi-trade works are required. Whilst we routinely collect resident satisfaction feedback following responsive repairs this is not robustly in place following major investment works. Actions to strengthen our approach around vulnerability and communication are as outlined in the Transparency, Influence and Accountability Standard section of this note. We also plan to introduce resident satisfaction surveys following major repairs and investment works later in 2024.

4.4. **TENANCY STANDARD**

4.4.1. Of the 18 expectations within this Standard, we assessed ourselves as compliant with 15, assessed 1 expectation as potentially non compliant and 2 were not applicable. Of the 16 compliant expectations 4 were identified as needing further work / improvement in order to achieve robust compliance.

Areas of Robust Compliance

4.4.2. Housing Leeds has a robust Lettings Policy which is closely aligned with strategic housing pressures and well connected to PRPs via nominations agreements. This policy is currently under review to identify how we can support increasing housing pressures. We also have robust tenancy management procedures in place around succession, introductory tenancies etc. which are subject to regular review and specialist staff, including a legal team who are able to offer legal support into process application. We also have dedicated staff to respond to possible tenancy fraud. We have a Mutual Exchange policy and procedures in place and support tenants who wish to complete an exchange.

Areas of Improvement Identified

4.4.3. **Allocations and Lettings** - whilst achieving the minimum level of compliance we identified that compliance could be strengthened on some of the 'Allocations and Lettings' expectations. Whilst we have a robust Lettings Policy which sets out our approach to allocations of Council housing we have some Local Lettings Policies (LLPs) in place for some localities and these have not been reviewed for a number of years and so are at risk of no longer being relevant or justified. We also identified weaknesses in our quality assurance arrangements to evidence our application of the lettings policy and CORE returns, impacting on data quality. Actions are underway to strengthen our compliance. Firstly, we are planning a review of all LLPs during 2024/25 alongside our Lettings Policy review. We are also currently introducing more robust training, guidance and QA of housing applications and lettings / CORE during 2024 to ensure more robust data.

4.4.4. **Mutual Exchanges** – we identified a potential area of non compliance in relation to mutual exchanges because we didn't robustly advise customers of the possible implications of a mutual exchange and there are opportunities to improve our communication of support available. Since the self assessment was undertaken we have now concluded a review of our Mutual Exchange procedures to strengthen our support offer to tenants and to ensure that tenants are advised of the possible implications. We have now published the potential implications on the mutual exchange web page, meaning that we are now compliant with this expectation.

4.5. **TRANSPARENCY, INFLUENCE AND ACCOUNTABILITY STANDARD**

4.5.1. Of the 23 expectations within this Standard, we assessed ourselves as compliant with 20 and identified 3 expectations where we were potentially non-compliant. Of the 19 compliant expectations 10 were identified as needing further work / improvement in order to achieve robust compliance.

Areas of Robust Compliance

- 4.5.2. Housing Leeds has a robust tenant engagement framework which offers a range of opportunities to get involved in service delivery and improvements, along with dedicated officers who work with local communities to hear the local tenant voice and maximise community engagement. We have also delivered a number of improvements to our complaints management over the last couple of years to strengthen our management of complaints and compliance with the Housing Ombudsman's Complaints Handling Code, including training for investigating officers, QA arrangements and embedding lessons learnt.

Areas of Improvement Identified

- 4.5.3. **Diverse Needs** – we identified a potential area of non compliance in relation to the diverse needs expectations. Whilst we collect equality and vulnerability data about customers there are not sufficiently robust processes in place to ensure that data remains updated and reports are not available to enable the routine use of data to undertake analysis of access to services. We also identified that we do not have a Vulnerability Policy or Strategy to inform how we support customers with a vulnerability and some gaps in our use of a CRM solution to record customer contact and consider vulnerability. Actions are underway to strengthen our compliance on these expectations. We are currently reviewing arrangements for the recording and reporting of equality data and reviewing reports available to enable us to undertake analysis of access to services by equality data. Alongside this we are planning to develop a Vulnerability Policy / Strategy which will set out how we will manage customer data on vulnerabilities, how this will be reported and how this will be used to assess accessibility and inform reasonable adjustments to service delivery.
- 4.5.4. **Information about Landlord Services** – whilst achieving the minimum level of compliance we identified that compliance could be strengthened on the 'Information about Landlord Services' expectations. Most information shared with customers on web pages, in the tenant handbook and in routine communications explains how services are provided but does not robustly provide clear details of service standards, tenant rights and landlord responsibilities as required by the updated standard. We assessed ourselves as being potential not compliance with expectation 4.2 because we don't routinely explain tenants rights and landlord responsibilities to customers and have not yet published the responsibilities of senior officers relating to the Consumer Standards. Actions are already underway to strengthen our compliance. We have recently started an urgent review of the web pages and tenant handbook to ensure that we achieve minimum compliance for non-compliant areas , i.e. communicating tenant rights and landlord responsibilities and publishing information about the roles and responsibilities of senior officers. However alongside this we are currently developing a Communication Policy / Strategy which will set out a consistent approach for how we communicate with our tenants and individual teams will be required to self assess against the standard and implement actions to strengthen compliance.

4.5.5. **Performance Information** – we assessed ourselves as achieving the minimum level of compliance with opportunities for improvement with all 4 expectations as at the point of the self assessment we were finalising our TSM submission and it had not been subject to any independent verification. However since the self assessment Internal Audit has concluded their audit to validate the methodologies and data used to report 2023/24 TSM performance and TSM performance has been submitted to the RSH. There are still further improvements to be made to enable easy, routine reporting of TSM performance in accordance with the technical definition.

4.5.6. **Self-Referral** – we assessed ourselves as achieving the minimum level of compliance with opportunities for improvement, as we had assessed some expectations as being potentially not compliant in some areas and had not yet advised the regulator. However, since the self assessment we have shared our self assessments with the RSH and met with them to review the extent of compliance and actions underway and so now consider ourselves to be robustly compliant with this expectation.

4.6. **NEIGHBOURHOOD AND COMMUNITY STANDARD**

4.6.1. Of the 9 expectations within this Standard, we assessed ourselves as compliant with all 9. However there were 3 expectations identified as needing further work / improvement in order to achieve robust compliance.

Areas of Robust Compliance

4.6.2. Housing Leeds is well connected in citywide strategic approaches to managing community safety, ASB and hate crime and policy and process is closely aligned to these strategic approaches, with strong strategic and operational partnerships embedded with specialist officers who are skilled in applying ASB tools and legal powers. Housing has similarly strong connections into citywide strategic approaches in the management of cases of domestic violence and abuse, being part of strategic and operational partnerships, including daily MARAC and Housing Management having the Leeds DVA Quality Mark. We are also well connected into other Council teams which provide services to shared spaces, e.g. environmental management, waste management with robust evidence of joint working along with connections into the Council's priority neighbourhood approach.

Areas of Improvement Identified

4.6.3. **ASB / Hate Incidents** - whilst achieving the minimum level of compliance on the 'ASB / Hate Incidents' expectations we identified that compliance could be strengthened on some expectations. Whilst we do have an ASB policy it has not been reviewed for some time and so is out of date. However a review of the policy is already underway and is due to be completed during 2024. In acknowledgement of low levels of satisfaction on TSM TP12 the policy review will include extensive resident engagement including around how we manage communications and how we achieve ongoing feedback.

5. Ensuring Compliance with Consumer Standards Where Landlord Functions are Delegated

5.1. Leeds City Council as landlord remains accountable to the RSH for compliance against the Consumer Standards where landlord functions are delegated to other Council teams or external organisations. BITMO and PFI contractors perform landlord functions on the council's behalf in specific geographic areas. Some other Council teams undertake landlord functions for a specific landlord service, e.g. Customer Service, Anti-social behaviour. In completing self assessments the following approach has been taken:

- Where landlord functions are performed by another Council service each self-assessment has been undertaken jointly between Housing Leeds and the Council service to assess the extent of compliance and to identify any actions needed to strengthen compliance.
- Contractual arrangements are in place with Belle Isle Tenant Management Organisation (BITMO) to perform landlord functions on behalf of the Council. We have therefore asked BITMO to undertake self-assessments using our template. The outcome of these self-assessments have been shared with the Head of Service lead for the four Standards, who has considered the self assessment's wider implications for the Council's overall compliance, along with giving consideration to action plans developed.
- Contractual arrangements are also in place for two large Private Finance Initiative (PFI) contracts in the city. We are in the process of reviewing the contracts and our processes, to ensure that they are fit for purpose and can hold contractors to account to ensure robust compliance with the Regulations. A self-assessment and joint action plan has been carried out jointly with Leeds City Council and the respective PFI Contractors.

6. Action Planning and Next Steps

- 6.1. Following on from the completed self-assessments, a comprehensive Action Plan has been developed for each Standard which identifies the actions needed to strengthen compliance. The Action Plans were developed under the responsibility of each Head of Service Standard lead with input and support from officers working in specific areas.
- 6.2. Work has begun to implement the Action Plans and strengthen compliance in identified areas giving urgent priority to expectations that are potentially non-compliant. Where actions require wider Council consideration, including digital improvements, reporting, web development, the Corporate Leadership Team have been made aware and will consider actions required.
- 6.3. A decision was taken to undertake the self-assessments in house, but with managers taking a rigorous and self challenging approach which was evidenced based. In order to ensure that there is some independence to the self-assessment approach actions will be undertaken during this year to ensure that there is external scrutiny of our approach:

- Internal audit will be undertaking an audit of our self-assessment approach and undertake some testing of the evidence available for a sample of expectations on each Consumer Standard.
 - We have discussed with the Tenant Scrutiny Board their involvement in providing some external scrutiny of our self-assessment outcomes at their June meeting and they are keen to play a role in this. As they have also embarked on their review into complaints, they have asked for a one-off session for the service to provide an overview of our work to date and to provide wider context and then include a regular agenda item in their future monthly meetings for us to report progress on delivering our actions in response to our self-assessments.
- 6.4. Details of our self-assessment outcomes have been shared with the RSH and a meeting took place in late June to consider areas of possible non compliance and to discuss actions that we have put in place to strengthen our compliance.
- 6.5. It is important that actions are delivered at pace in order for us to provide assurance to the Leeds Housing Board and the RSH that we are strengthening our compliance against the standards. Robust arrangements have been put in place to report progress with agreed actions, with monthly reports of progress into the Housing SMT.
- 6.6. The Leeds Housing Board will also be kept informed of progress with strengthening our compliance, with a further update report planned for November 2024.

7. Recommendations

- 7.1. That the Board consider and comment on the approach being taken to undertaking the self-assessments, the outcomes and actions underway following the assessments.
- 7.2. That the Board agree to a further update report being provided in November 2024.