

**Title: Consumer Standards progress update**

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## **1. Background**

- 1.1. A key part of the Social Housing (Regulation) Act has been to empower the Regulator for Social Housing (RSH) to renew the Consumer Standards.
- 1.2. The Consumer Standards set out the requirements that social housing providers are obligated to meet in the quality of the homes and services they provide their tenants.
- 1.3. Coming into force on 1<sup>st</sup> April 2024, the current Consumer Standards are:
  - **Neighbourhood and Community Standard** – this specifies the outcomes landlords must deliver by engaging with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods and feel safe in their homes.
  - **Safety and Quality Standard** – this standard specifies the outcomes landlords must deliver in relation to the safety and quality of tenants' homes.
  - **Tenancy Standard** – this standard specifies the outcomes landlords must deliver about the fair allocation and letting of homes and how tenancies are managed and ended by landlords.
  - **Transparency, Influence and Accountability Standard** – this specifies the outcomes landlords must achieve about being open with tenants and treating them with fairness and respect so that tenants can access services, raise complaints, influence decision making and hold their landlord to account, including collecting and publishing the data required by the Tenant Satisfaction Measures
- 1.4. At its meeting in November 2023 the Leeds Housing Board received a report on preparations being undertaken to prepare for the implementation of the updated Standards.
- 1.5. The Board was appraised of the intention to undertake a comprehensive self-assessment against each of the four Standards, the criteria that would be used, and the results of the first self-assessment that was completed, against the Tenancy Standard.
- 1.6. At the meeting in July, the Board received a report detailing the results of those self-assessments and the Action Plans that were produced to identify work needed to be done to achieve compliance
- 1.7. This report brings the Board the latest position on progress against the Consumer Standards.

## 2. Main Points

- 2.1. At its July meeting the Board was appraised of the results of the self-assessments undertaken on each of the Consumer Standards.
- 2.2. Each Standard is made up of a number of 'specific expectations', and we gave ourselves a RAG ('Red, Amber, Green') rating against each of them.
- 2.3. The table below shows the updated RAG rating as of October.
- 2.4. The RAG ratings are defined as:
  - Red – potentially non-compliant
  - Amber – minimum compliance with improvement opportunities
  - Green – robust compliance
- 2.5. Each Consumer Standard has a named Head of Service lead who has responsibility for leading on each one. The Safety and Quality Standard lead is Adam Crampton and the lead for the remaining three Standards is Mandy Sawyer.

Consumer Standard	Number of Specific Expectations	RAG ratings					
		Green		Amber		Red	
		July 24	Oct 24	July 24	Oct 24	July 24	Oct 24
Safety & Quality	12	5	5	6	6	1	1
Tenancy	18 (two are non-applicable to LCC because we don't use fixed-term tenancies)	12	12	3	4	1	0
Transparency, Influence and Accountability	23	9	14	11	7	3	2
Neighbourhood and Community	9	6	6	3	3	0	0

- 2.6. Some good progress has been made since July in delivering actions to strengthen our compliance with regulatory standards. Whilst some expectations continue to be rated at red and amber, many of the actions are considerable pieces of work which will take a number of months to complete. We have taken a cautious approach to de-escalating RAG ratings, de-escalating only where there is a clear evidence to support that the expectation is fully met. An update on the self assessment and actions underway is outlined for each of the Consumer Standards below.

## 3. SAFETY AND QUALITY STANDARD

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

An action plan is in place to deliver improvements to strengthen our compliance. Progress in delivering improvement actions is outlined below:

**3.2. Stock Quality and Decency**

3.3. We continue to identify a potential area of non-compliance relating to the 'Stock Quality and Decency' expectation to have an accurate record at an individual property level of condition of their stock, with a requirement for all properties to have had a full stock condition survey within the last 5 years. As at the end of June 2024 74% of Council homes had received a stock condition survey within the last 5 years but only 36% had received a full stock condition survey, with the remaining properties receiving elemental surveys. We have a target in place to undertake stock condition surveys of 100% of stock by the end of June 2026. We have internal staffing resource capacity to deliver stock condition surveys to 20% of stock each year and surveyors are making good progress in completing surveys. As at the end of Q2 (September 2024) 48% of our stock has now received a full stock condition survey in the last 5 years. We have recently developed a Stock Condition Surveying Strategy and to accelerate the number of surveys completed we are currently procuring an external contractor to complete additional stock condition surveys to ensure that the 2 year target is met. We expect to mobilise the contract in early 2025. Alongside this we are currently reviewing our communications and no access procedures to maximise access to undertake surveys. We also continue to work with contractors and IDS colleagues to ensure automated integration between systems for the transfer of stock condition data.

**3.4. Health and Safety**

3.5. Whilst robustly complying with Health and Safety legislative responsibilities the initial self assessments identified improvement opportunities to strengthen our compliance with health and safety expectations – updating some key health and safety policies, strengthened performance reporting and strengthened arrangements where landlord functions are undertaken by other Council teams. We have made some really good progress in actions to strengthen compliance in these areas. A number of key Health and Safety policies have recently been reviewed, including fire safety, electrical safety and legionella. We have developed a Building Safety dashboard which reports performance on key health and safety indicators on a monthly basis. We are also working with other Council teams to formalise service level and performance reporting arrangements for services provided to tenants.

**3.6. Repairs, Maintenance and Planned Improvements**

3.7. Again, whilst robustly complying with legislative responsibilities the initial self assessments identified improvement opportunities to strengthen our compliance with repairs, maintenance and planned improvements expectations – identifying that an assessment of tenant vulnerability at the

point of raising a repair could be more robust, along with improvements in communication. Progress in delivering these actions are as outlined in the Transparency, Influence and Accountability section of this report. Customer satisfaction surveys have been re-introduced following the completion of planned investment works, meaning the feedback received from customers can now be used to inform future investment programmes, specifications and delivery performance.

#### **4. TENANCY STANDARD**

4.1. Of the 18 expectations within this Standard, we now assess ourselves as compliant with 16 and 2 were not applicable. Of the 16 compliant expectations 4 are identified as needing further work / improvement in order to achieve robust compliance. Progress in delivering improvement actions is outlined below.

##### **4.2. Allocations and Lettings**

4.3. Whilst achieving the minimum level of compliance the initial self assessments identified that compliance could be strengthened on some of the 'Allocations and Lettings' expectations. Local Lettings Policies (LLPs) in place for some localities have not been reviewed for a number of years and so are at risk of no longer being relevant or justified and we identified weaknesses in our quality assurance arrangements to evidence our application of the lettings policy and CORE returns, impacting on data quality. We have made some progress in progressing actions. We have made some positive progress in progressing actions – we have appointed a staffing resource who will co-ordinate a review of our LLPs, a proposed framework for LLP reviews has been developed and work is underway to gather evidence to start reviews once the framework has been considered as part of the Lettings Policy changes at Executive Board in February 2025. We are also currently part way through reviewing our QA arrangements of housing applications and lettings / CORE, ensuring that improved guidance is in place along with training to ensure that more robust data is recorded in systems.

##### **4.4. Mutual Exchanges**

4.5. The initial self assessment 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. Really good progress has now been made since then – we have now concluded a review of our Mutual Exchange procedures these areas and training is underway ahead of rolling out updated arrangements. We have also now published the potential implications on the mutual exchange web page, meaning that we are now compliant with this expectation.

## **5. TRANSPARENCY, INFLUENCE AND ACCOUNTABILITY STANDARD**

5.1. Of the 23 expectations within this Standard, we now assess ourselves as compliant with 21 and identified 2 expectations where we were potentially non-compliant. Of the 21 compliant expectations 7 are identified as still needing further work / improvement in order to achieve robust compliance. Progress in delivering improvement actions is outlined below.

### **5.2. Diverse Needs**

5.3. We continue to identify a potential area of non compliance in relation to the diverse needs expectations. Whilst we collect customer equality and vulnerability data there are process weaknesses around updating data and reporting and we also do not have a documented Vulnerability Policy which sets out a consistent approach to supporting customers with a vulnerability. We also have some gaps in our use of a CRM solution to record customer contact and consider vulnerability. Actions are progressing to strengthen our compliance on these expectations. We are currently reviewing arrangements for the recording and reporting of equality data and have made some improvements. We are also reviewing reports available to enable us to undertake analysis of access to services by equality data. Alongside this we have established a service wide Vulnerability Working Group which is currently leading our approach to developing a Vulnerability Policy 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. Housing is part of a Council wide Customer Strategy transformation project and a high level option appraisal of interim CRM improvements has been considered and detailed costed proposals are currently being developed.

### **5.4. Information about Landlord Services**

5.5. Whilst achieving the minimum level of compliance there continue to be improvement opportunities to strengthen compliance with the 'Information about Landlord Services' expectations as information that we share with customers on our website, in the tenant handbook and in routine communications is not robustly aligned to the Standard. We also continue to assess ourselves as potentially non compliant with expectation 4.2 because we don't routinely explain tenants rights and landlord responsibilities to customers as part of service communications. We have recently developed a Communication and Engagement Policy, which will be considered separately on this agenda, which sets out a consistent approach to how we manage customer communication and engagement. The policy will be rolled out during November and services will undertake self assessments of their compliance and develop action plans to strengthen compliance. Alongside this we have reviewed the repairs web pages to make urgent improvements and plans are underway to review all web content and the tenant handbook to be more closely aligned to the Standard.

## **5.6. Performance Information**

- 5.7. We continue to assess ourselves as achieving the minimum level of compliance with opportunities for improvement. Whilst the routine in year reporting of TSM management indicators is in place manual intervention and adjustments are required to ensure that performance is reported in accordance with the technical definition and arrangements are ad hoc. Work is underway to undertake system changes where possible and to standardise reporting arrangements and these are becoming embedded as we progress through the year.

## **6. NEIGHBOURHOOD AND COMMUNITY STANDARD**

- 6.1. Of the 9 expectations within this Standard, we continue to assess ourselves as compliant with all 9. However there are 3 expectations identified as needing further work / improvement in order to achieve robust compliance.
- 6.2. **ASB / Hate Incidents**
- 6.3. Whilst achieving the minimum level of compliance on the 'ASB / Hate Incidents' expectations compliance could be strengthened on some expectations due to our current ASB policy being out of date and weaknesses in ASB reporting. Some really good progress has been made in progressing actions. We have undertaken a robust review of our ASB policy, with customer engagement and this will be finalised and rolled out alongside updated customer communications and procedures in the next few weeks. ASB data sets have recently been reviewed and reports are also currently being developed to enable more robust trend and performance reporting on a monthly basis.

## **7. Next Steps**

- 7.1. Leadership of the Consumer Standard Action plans will continue to be provided by Adam Crampton and Mandy Sawyer as Heads of Service, and their role will continue to be to oversee and drive the implementation of actions. This includes working with BITMO, PFI and other service providers to assess their compliance and agree actions to strengthen compliance.
- 7.2. Progress in delivering the action plans will continue to be reported into the monthly Social Housing Regulation Board, chaired by Gerard Tinsdale. Each month the self assessment RAG ratings are reviewed, taking into account actions undertaken and ratings are escalated or de-escalated accordingly.
- 7.3. The self assessment outcomes and action plans are being shared with the Tenant Scrutiny Board for their input and challenge of the approach. To date the Tenancy Standard and Neighbourhood and Community Standard have been considered by the Tenant Scrutiny Board, with the remaining 2

standards being considered in November and December. The Board has been broadly supportive of the approach and identified priorities.

- 7.4. Internal Audit are currently undertaking an audit of the self assessments completed earlier this year to assess the robustness of the assessment undertaken. The outcome and key findings from this audit will be reported to a future Board meeting.
- 7.5. A further meeting is arranged with the Regulator of Social Housing in early December to review progress in the delivery of actions to strengthen Consumer Standard compliance. The outcome of this meeting will be shared with the Board at a future Board meeting.
- 7.6. The Leeds Housing Board will continue to be kept informed of progress with strengthening our compliance.

## **8. Discussion Points**

- 8.1. Does the Board have any specific comments on the RAG ratings?
- 8.2. Is the Board satisfied that the process that has been established to report into the SHR Project Board will give us an accurate and up-to-date picture of how we are progressing in the areas identified?
- 8.3. Does the Board have any preference as to how often it wants to receive reports on progress?

## **9. Recommendations**

- 9.1. The Leeds Housing Board is asked to note and comment on the latest work being done to achieve full compliance with the Consumer Standards.