

**Report for:** 18 April Cabinet

**Title:** Housing Services Improvement Plan and Compliance Assurance Statement

**Report authorised by :** David Joyce, Director of Placemaking & Housing

**Lead Officer:** Jahedur Rahman, Operational Director of Housing Services and Building Safety

**Ward(s) affected:** All

**Report for Key/  
Non Key Decision:** Key Decision

## **1. Describe the issue under consideration**

- 1.1 This report sets out the Council's plans to deliver a high quality and resident focussed landlord service to our tenants and leaseholders. The Council brought its housing management services, previously provided by its arm's length management organisation, Homes for Haringey, back in-house in June 2022. The landlord function that the Council brought back in-house is far from being the high-quality service that residents deserve and expect. There are important opportunities to integrate some of these services with others within the Council; to deliver greater value for money and to be more focussed on the needs of residents. There are also many services where performance needs to improve and a need to get the basics right, for instance through ensuring that repairs satisfaction improves by making sure that we get a first-time fix.
- 1.2 In June 2022, the Council commissioned an external consultant to produce an internal report on the status of the landlord function at the point of insourcing. This provided a high-level analysis of the state of the Landlord service and recommended an improvement plan be produced with clear milestones to address the service specific issues; and identify clear accountabilities, with timelines.
- 1.3 In December 2022, the Council also commissioned a Property Compliance Health Check to assess the approach to managing six compliance areas: gas and heating; electric; fire and building safety; asbestos; water, and lifts. They considered subject specific legislation and regulatory standards. This recent review of our housing building compliance also identified a number of areas where governance needs to be simplified to ensure that issues can be escalated within the organisation and that there is dedicated oversight which can ensure action in areas where we are not performing. In the light of this health check, the Council self-referred to the Regulator for Social Housing.
- 1.4 In response to the Health Check Housing Service Improvement priorities have therefore been developed considering the current health and safety, compliance, broader housing service improvement, benchmarking data and value for money information and resident levels of satisfaction. In addition,

priorities have been set where weaknesses have been identified in terms of legislative or statutory frameworks.

- 1.5 This plan is also grounded in what we know matters most to our tenants and leaseholders and what we have heard from them through significant engagement including via the Resident Scrutiny Panel and Core Group established in anticipation of insourcing the ALMO. We recognise that tenants and leaseholders are experts in their own homes and communities. We will put their voice and experience at the heart of our improvement journey with new opportunities to have their voices heard.
- 1.6 This plan refers only to Council owned managed stock.
- 1.7 Alongside our statutory and regulatory commitments to reporting and accountability we have committed to being transparent about our progress. A compliance assurance statement will be submitted to Cabinet annually showing our compliance against the big six compliance areas (gas, electric, fire safety, asbestos, legionella and lifts). Tenants and leaseholders will also receive regular updates. The Compliance information in this report forms our compliance assurance statement for 2023. In future years this will be provided as a stand alone report.

## **2. Cabinet Member Introduction**

- 2.1 This administration oversaw the insourcing of Homes for Haringey, which took place in June 2022. I'm proud to be the cabinet member overseeing such an important function of a council – providing homes for our residents – whether tenants or leaseholders – that they are proud of, where they can raise families and set down roots in this wonderful borough. A good home is transformative in so many ways. But we have been letting many of our residents down, over many years.
- 2.2 Following the insourcing we actively sought external views on the performance of our housing services, and the results are sobering. We take these findings extremely seriously – that's why we self-referred to the regulator for social housing as soon as these major and systematic failings were made clear. Setting out our housing improvement plan is the next major step in our journey to transform housing services to our 20,000 tenants and leaseholders in Haringey.
- 2.3 We are serious about change – as a council, and as a landlord. Putting our residents at the heart of what we do is essential. If we are serious about being an excellent landlord, we need to go far beyond the statutory minimum standards, and listen to our residents, learn what is important to them, how they would like us to develop services, and – crucially – act on this. That's why engagement with residents is a major pillar of the housing improvement plan.

2.4 We have a lot of work to do, and as a Cabinet we recognise how important this is. Good governance and clear reporting to Cabinet is set out in this report, so that we are assured that progress is being made.

### **3. Recommendations**

Cabinet are asked:

- 3.1 To approve the attached Improvement Plan as set out in Appendix 1;
- 3.2 As this is a live document, delegate any subsequent changes required to the Director of Placemaking & Housing in consultation with the Cabinet Member for Housing Services, Private Renters and Planning and the Director of Finance
- 3.3 To approve the virement of up to £2m additional funding for the improvement programme, to be vired from the HRA Reserve, and to delegate the finalisation of that amount to the Director of Finance, in consultation with the Cabinet Member for Finance and Local Investment
- 3.4 To note proposals for tenant and leaseholder engagement and involvement in the housing improvement process – as part of our wider commitments to work in partnership with our residents under the Haringey Deal.
- 3.5 To note the Council's performance in relation to the six areas of property compliance; and subsequent self-referral to the Regulator for Social housing (RSH) where we identified a potential failure to meet statutory health and safety requirements
- 3.6 To approve the Compliance Assurance Statement in section 8 and note that subsequent assurance statement updates will be provided to Cabinet on an annual basis.

### **4.0 Reasons for decision**

4.1 It is essential that as a landlord the Council provides a good service to tenants and leaseholders, and as a minimum complies with all regulatory and statutory duties. Residents need to be assured that the Council is committed to improving its services, that it has a clear plan to do so, and is holding itself accountable.

### **5.0 Alternative options considered**

5.1 Alternative options include not implementing an improvement plan. However, since the Council is aware of a number of areas where substantial improvement is essential to ensure the safety and wellbeing of our residents, a clear plan to ensure and monitor continuous improvement and compliance with statutory responsibilities is essential.

### **6.0 Background information**

### Insourcing of Homes for Haringey

- 6.1 On 7 December 2021, Cabinet resolved that the Council's housing service which was then provided by Homes for Haringey ("HfH") should be brought back in-house and delegated authority to officers to deal with the detailed implementation process. It was agreed that the transfer would take place on 1 June 2022.
- 6.2 With the insourcing of the Landlord function in June 2022, Phase One of the integration was largely a "lift and shift" approach with some duplicated functions from Homes for Haringey moved to the relevant service within the Council. Following the above integration, interim arrangements were put in place to manage the initial transfer.
- 6.3 In June 2022, an external consultant produced a 'state of the nation' report on the status of the landlord function at the point of insourcing by the Council. This provided the Council with a high-level analysis of the state of the Landlord service and recommended an improvement plan be produced with clear milestones to address the service specific issues and identify clear accountabilities, with timelines.
- 6.4 The external consultant is a highly experienced housing leader, with experience of delivering high performing housing services across several councils and housing associations. This ensured that the review of our services was undertaken from an independent perspective, albeit with strong buy-in from our staff and teams.
- 6.5 The report identified key areas of the service that were not performing to the standard that would be expected, and were below the benchmark when compared to other services. Voids, tenancy management and repairs were highlighted as requiring significant improvement.
- 6.6 With the appointment of the Operational Director for Housing Services and Building Safety, we are now in the next phase where the approach to service improvement is more consolidated and streamlined. Further details are contained within Section 9 of this report

### Housing Ombudsman

- 6.7 At the point of insourcing, Housing Services had a number of historic cases which had received Complaint Handling Failure Orders. The Council has implemented wider plans to improve the complaints handling process, as well as to streamline the reporting of damp and mould cases and to ensure these are prioritised for repair.
- 6.8 In February 2023, the Chief Executive, Director of Placemaking and Housing, Director of Culture, Strategy & Engagement and Operational Director for

Housing Services and Building Safety met the Housing Ombudsman at request by Haringey to discuss our improvement plan for complaint handling and discuss the Housing Ombudsman notice of their intention to undertake an investigation into our damp and mould issues.

- 6.9 In the autumn of 2022 the inquest into the death of Awaab Ishak in Rochdale shone a light on the risks posed by serious damp and mould. As a result of this, and concerns raised by the Housing Ombudsman, we have begun significant work to understand and deal with this issue.
- 6.10 Haringey Council will from now on meeting with the Housing Ombudsman on a regular basis to review open cases and reset the relationship with the Housing Ombudsman with a view to improving overall complaint handling and making internal changes to ensure the directorate adopts a culture of learning from complaints and resolving issues first time.

#### Self-Referral - Regulator of Social Housing

- 6.11 In December 2022, the Council also commissioned a Property Compliance Health Check to assess the approach to managing six compliance areas: gas and heating; electric; fire and building safety; asbestos; water, and lifts. They considered subject specific legislation, regulatory standards and our wider health and safety obligations under the Health and Safety at Work Act 1974.
- 6.12 The health check found a number of areas of non-compliance, with several key recommendations made, particularly around overdue fire risk actions and electrical safety. Further details can be found in Section 7 of this report.
- 6.13 The Regulator of Social Housing (RSH) is the government body tasked with overseeing the regulation of the social housing sector, regulating both local authority and housing association landlords, collectively known as Registered Providers (RPs). The RSH adopts an assurance-based co-regulation approach. This means that the local authority executive, usually the cabinet, in local authority landlords, or the board of the housing association are responsible for ensuring they comply with the regulatory standards set by RSH.
- 6.14 This co-regulation approach is consistent across other London Boroughs, a number of which have also self-referred for similar breaches of the standards over the last year.
- 6.15 Following the findings of the external health check, the Council made a self-referral to the Regulator of Social Housing ('the Regulator') in January 2023. The Regulator was also aware that 30% of the council's housing stock does not meet the Decent Homes Standard and that our recent performance on repairs required 'significant levels of improvement' from a report made to the Council's

6.16 The Regulator responded in February 2023 to confirm that they had concluded that the council had breached two parts of the Home Standard:

- Part 1.1 (a) of the Home Standard says that registered providers shall: (a) ensure that tenants' homes meet the standard set out in section five of the Government's Decent Homes Guidance and continue to maintain their homes to at least this standard.
- Part 1.2 (b) of the Home Standard says that registered providers shall: (b) meet all applicable statutory requirements that provide for the health and safety of the occupants in their homes.

## 7.0 Compliance Health Check background

### Summary of Findings

7.1 In 2022 the Council commissioned a compliance health check to assess its approach to managing six compliance areas: gas and heating, electric, fire and building safety, asbestos, water, and lifts. The full report is attached as Appendix 2 of this report.

7.2 The Pennington Choices Health Check of the Council's compliance data highlighted a number of areas where the Council's performance needs to improve. Although the picture is mixed with full compliance in a number of the 'big six' compliance areas (as set out in Table 1), the report has made a number of recommendations and set out a road map to improve the reliability of the Council's data architecture and reliability in respect of compliance. It also highlighted considerable under performance in respect of open fire risk assessment actions including, at the time of the report being finalised, over 4,769 high priority actions which should have been completed within 30 days. The report also identified that while a satisfactory electrical installation condition report (EICR) is always produced following inspection and there is a five-year programme in place, the management of electrical safety requires improvement with over 8000 properties not having a valid EICR report within the last 5 years, which is the Council's policy and over 4000 properties where the Council was not able to confirm a valid EICR report within the last ten years.

7.3 The Council is fully committed to responding to the findings of the Pennington Choices report and implementing its recommendations, and dealing as a priority with the identified areas of non compliance in respect of fire safety and electrical safety. As noted in this report the Council is working closely with the Regulator for Social Housing, including through our decision to self-refer to the regulator so that there is transparent oversight of the progress which the Council makes. A follow up review by Pennington Choices is also planned.

7.4 The Council has also taken a series of actions to ensure the number of overdue actions starts to rapidly come down since we initially reported the figures to the Regulator in December. Section 8 of this report outlines the Compliance Assurance statement which includes details of how the updated compliance position will be reported to cabinet. Table 1 represents the Council’s first annual housing compliance assurance statement to be reported to Cabinet in addition to the officer governance structures to which the data is reported . The intention is to build quickly on this position and as a central plank of our Housing Improvement Plan as detailed in Appendix 1.

Table 1 below shows the compliance position as of December 2022.

Overall compliance position					
Compliance area	Total properties	On programme	Compliant	Non-compliant	Requiring validation
<b>Domestic</b>					
Gas	15,191	15,099	15,099	0	Full validation required
Electric (5-year programme)		15,191	6,909	8,282	
<b>Communal blocks/ schemes</b>					
Gas	206	26	25	1	Full validation required
Electric		771	743	28	
Fire risk assessments		1,632	1,553	79	
Asbestos		782	748	34	
Water		487	487	0	
Lifts		149	149	0	

A compliance road map has been created and is included in the Improvement Plan under Appendix 1 to provide a clear plan and action for addressing the above issues.

## 8.0 Commitment to produce an annual Housing Compliance Assurance Statement

8.1 The Council is responsible for ensuring that our work is conducted in accordance with proper standards and regulations, and to make arrangements to secure continuous improvement in the way in which our functions are exercised, with regards to a combination of economy, efficiency and effectiveness.

8.2 In order to discharge this responsibility, we have put in place further governance arrangements (as detailed in Appendix 1 in the Improvement Plan). This, coupled together with the improvement Plan actions form part of the Council’s Compliance Assurance Statement to ensure that improvements are being made in respect of the safety of tenants and residents.

- 8.3 As part of the statement, it is also proposed that that Cabinet are updated annually regarding performance in the “Big Six” areas of compliance with which the industry generally tracks its performance with regards to the safety of homes within its ownership. It should be noted that these are not the only requirements with regards to safety, however the key ones to show adherence to standards. These are:
1. Gas
  - 2 Electrical
  - 3 Water/Legionella
  - 4 Lifts
  - 5 Asbestos
  - 6 Fire

## **9.0 Introduction of Improvement Plan**

- 9.1 In June 2022, an external consultant produced a ‘state of the nation’ report on the status of the landlord function at the point of insourcing by the Council. This provided the Council with a high-level analysis of the state of the Landlord service and recommended an improvement plan be produced with clear milestones to address the service specific issues and identify clear accountabilities, with timelines.
- 9.2 The report identified key areas of the service that were not performing to the standard that would be expected, and were below of the benchmark when compared to other services. Areas such as Voids, tenancy management, Repairs amongst others were highlighted as requiring significant improvement.
- 9.3 There are some general areas that also would naturally need to be reviewed following any insourcing exercise – general culture, staffing and policies and procedures are need to be reviewed in depth.
- 9.4 The report did find areas of strength – it must be recognised that there are many high calibre and hardworking members of staff across the landlord function who are delivering a good service to residents.
- 9.5` It is recognised that there needs to be significant improvement including with leadership in the landlord function, to connect people to their roles, to raise staff standards and expectations and to restore a sense of pride in their work and to develop a performance culture.
- 9.6 This plan, several key programmes of work have been developed to improve service delivery to residents; improve efficiency and performance; and ensure regulatory and legislative compliance. There are also a range of improvements aimed to “get the basics right.” It should be noted that this is a live document, which will be subject to change as changes and improvements are introduced.

This plan relates only to Council owned managed stock.



## 9.7 Objectives of the Housing Improvement Plan

The main objective of the plan is to grasp the opportunity to improve services for the benefit of our residents and tenants. More specifically to:

- **Improve tenant involvement and satisfaction to deliver a resident focussed housing service:** Strengthen tenant engagement and involvement in decision-making and service delivery. Greater transparency with tenants and leaseholders. Improved resident satisfaction levels.
- **Improve ways of working and performance:** develop and embed new staff structures, review policies, processes, and procedures, and develop a strong culture of both collaboration and performance management.
- **Maximise ICT opportunities to improve the customer experience:** by making best use of current systems and ICT, digital and website systems. Deliver opportunities to improve the customer experience and minimise failure demand. Improved, modern ways of working for staff.
- **Improve compliance and make resident safety our number 1 priority –** ensuring the Council is compliant with all appropriate legislative and statutory standards, including but not only, new Social Housing Regulator Standards, Building and Fire Safety legislation ensuring are homes and estates are safe for our residents. Implementing all of our commitments to the social housing regulator and ombudsman in respect of tackling damp and mould.
- **Improve complaint handling –** leading to a significant reduction in numbers of complaints, and a reduction in complaints which escalate to Stage 2 and the Housing Ombudsman.
- **Deliver Value for Money (VfM):** Maximise VfM from the HRA by prioritising expenditure that best meets the needs of our tenants and driving efficiencies.
- **Invest in the quality of our homes through our planned maintenance programme –** ensuring all the Council's homes meet Decent Homes standards and meet high standards of energy efficiency.
- **More visible** and locality-based teams on estates more frequently.
- **Upskilled staff** and better, more attractive jobs.

## 9.8 Key priorities

The key focus areas are set out below:

- Resident Led Improvement with resident at the heart of decision making.
- Void management transformation
- Repairs Service Transformation
- Income management and collection
- Improved Homeownership Service
- Improving Estate and Neighbourhood Management standards
- Better Neighbourhood and Tenancy Management
- Statutory Compliance with Property Services
- Compliance and planned maintenance performance improvements.

- Improved complaints handling
- Update and Review Policies and Procedure
- Sheltered Accommodation
- Culture Change

## **10 Resident Led engagement at the heart of Decision making**

- 10.1 We know that we need to build trust with our residents and we will only be able to do this when they see real progress. Our residents are experts about their homes, estates and communities and we want to benefit from their views and experiences as we look to improve the way we work.
- 10.2 When Haringey's housing services returned to the direct control of the council in 2022 the Cabinet agreed that existing resident engagement arrangements would be largely continued and extended initially pending a future review of arrangements. In addition, a new 'Core Group' was created to recognise that the arrangement common in ALMOs of tenant representation on the board was not replicable within a local authority. This group was created in anticipation of the insourcing and launched in April 2022. We are grateful for the work of tenants and residents who have been a part of these structures over the last few months. Consistent with the commitments made in the Cabinet report in March 2022 we will now commence some further work – co-designed with tenants and leaseholders about what our future, long-term arrangements will look like, drawing on best practice from other areas.
- 10.3 Pending this work it is critical that we are transparent about how we progress with this Improvement Plan so we will provide regular updates for our tenants and leaseholders. In addition, we want to work with our residents so that they are able to shape and influence how our housing services work in the future – in line with the Haringey Deal.
- 10.4 This Housing Improvement Plan is grounded in what we have heard from our residents and leaseholders. This includes engagement in the STAR surveys; through the Resident Scrutiny Panel and the 'Resident Voice Group'. Following the approval of this Plan by Cabinet we will launch a programme of workshops that will give tenants and leaseholders the chance to have their voices heard.
- 10.5 In addition, a new residents forum will be established to ensure the Housing Improvement Board, chaired by the Chief Executive, is informed by the views and experiences of tenants and leaseholders. Table 2 in Appendix 1 outlines the Resident governance framework.
- 10.6 In relation to the Improvement Plan, we have developed a set of proposed Housing Standards that outlines our resident offer for each service area which is detailed in the Improvement Plan (Appendix 1). As mentioned in 10.2 above, this will be co-designed with tenants and residents.

## **11 Governance Framework**

- 11.1 Since the insourcing of the Landlord function in June 2022, there has been a lot of work to integrate our Housing Services within the Council, however it has become clear that the current approach to service improvement in Housing

Services needs an overhaul, as some aspects of our service improvement approach is fragmented.

- 11.2 Phase one of the integration was largely a “lift and shift” approach with some duplicated functions from Homes for Haringey moved to the relevant service within the Council. Temporary governance arrangements were put in place in June 2022.
- 11.3 In January 2023, the Director of Placemaking and Housing and the Operational Director, Housing Service and Building Safety agreed a new set of arrangements to ensure that key housing improvement plan workstreams have dedicated oversight and clear escalation channels to senior boards and ensure member oversight.
- 11.4 As part of the governance arrangements, a Members Improvement Board has been established to provide a steer, monitor and provide direction on the required changes and implementation resulting from the Housing Services Improvement Plan. This group will help inform officers progress any changes required via the relevant governance routes. Currently the Board is chaired by the Chief Executive and is attended by the Cabinet Member for Housing Services, Private Renters and Planning plus 3 Labour members and 1 Liberal Democrat member. Senior officers will also attend the board as required on a non-core membership basis. Meetings will take place every 6 weeks.
- 11.5 This stronger governance framework provides a clear assurance around our commitment to ensuring adherence to compliance requirements. Through this governance framework, we monitor the achievement of our improvement plan and strategic objectives, and provide a framework which engages and works with members and the community. This governance framework will support the Council in adhering to the Compliance Assurance statement detailed in Section 8 of this report.
- 11.6 The full governance proposals are detailed in Appendix 1 Improvement Plan.
- 12.0 **Timescale of programme.**
- 12.1 The proposals in the Housing Improvement Plan have been prioritised to focus on key areas of change required to improve services which are critically important for residents (such as our Housing Repairs Service and Building Safety) and the programme will initially run for 24 months, however given the amount of change which is needed it is recognised that some activity will be required to be taken over the longer term. It should also be noted that the Council may have to prioritise focusing on areas related to compliance with regulatory requirements as set by the Regulator for Social Housing.

### **13.0 Service Improvement Budget**

13.1 To modernise and streamline the service and drive improvement there is a need for a revenue and capital funded service improvement budget from the HRA. The draft estimates as to what this might cost are set out below:

	<b>TOTALS</b>
ICT development	800k
Additional Investment in housing Management	500k
Additional investment in Repairs Service	£2.8m
<b>Resident Engagement</b>	£300k
<b>Policy Development</b>	£160k
<b>Service Reviews</b>	£340k
<b>Cultural Change</b>	£150k
<b>TOTAL</b>	<b>£4.7 M</b>

13.2 The Housing Revenue Account Business Planning process which underpins the Council's budget setting process has already made provision for service improvement works for £3.1 million over a three year period (some of which is already being utilised on improvement work). This provision will clearly provide the majority of the funding for our proposed service improvement plan. The draft expenditure plan above needs further review before it is finalised, which will be undertaken in conjunction with the Director of Finance. It is recommended that a top-up to the existing budget provision be agreed now, which could be up to £2m, with the finalisation of this amount being delegated to the Director of Finance in consultation with the Cabinet Member for Finance and Local Investment. This additional budget will be vired from the HRA reserve and replenished in future years, once the Housing Improvement Plan is embedded and delivers its intended efficiencies.

#### **14.0 Considerations and risks**

14.1 Overarching key considerations and risks are: -

- There is a risk governance of the plan and management of service improvement strategically will remain fragmented unless this is clarified for all parties.
- Clarity on roles and responsibilities around Service Improvement and the Team needed.
- Budgetary provision (lack of) this may affect delivery of some of these projects and lead to a need for some key ticket items to be delayed or curtailed.
- Resourcing
- Failure of resident engagement practises and structures to ensure the voice of tenants and leaseholders is central to service improvement.
- Workforce planning; recruitment and retention
- Availability of supply chain to assist the Council in delivering the improvement plan

## **15.0 Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'**

15.1 The confirmed continued improvements and reviews contributes to Theme 5 of the Corporate Delivery Plan Of Homes for the Future specifically the vision of a borough where everyone has a safe, sustainable, stable and affordable home.

## **16.0 Statutory Officer Comments**

### **16.1 Finance**

16.1.1 The final sum required for the implementation of housing improvement plan is yet to be finalised, with the draft estimated being £4.7m. A budget provision of £2.9m was made in the recently approved future years HRA budget/MTFS, over and above £200k projected in the current year.

16.1.2 The above report describes the proposed approach to the finalisation of this budget increase. The additional funds would be vired from the HRA Reserve, which is currently at £20.8m.

16.1.3 The Council would then look to restore the reserve to its original level in subsequent financial years.

### **16.2 Procurement**

16.2.1 There are no procurement implications in this report as it does not cover any procurement, any procurements that may stem from these changes should be covered by separate reports.

### **16.3 Head of Legal & Governance**

16.3.1 The Head of Legal and Governance has been consulted in the drafting of this report and comments as follows.

16.3.2 The RSH has statutory responsibility for setting and enforcing housing standards in the social housing sector, including local authority housing.

16.3.3 The Housing Ombudsman is focused on individual complaints about housing services, albeit is empowered to investigate systemic causes underlying complaints.

16.4.3 As a registered provider of Social Housing the Council is required to comply with the consumer standards set by the RSH, These include the Home Standard.

16.4.4 Section 198A of the Housing and Regeneration Act 2008 enables the RSH to use its regulatory and enforcement powers if a registered provider such as the council has failed to meet a consumer standard.

16.4.5 Following the Council's self-referral, the RSH has issued notice under a (non-statutory) Regulatory Notice<sup>1</sup>,, having been satisfied that the Council breached of parts 1.1 and 1.2 of the Home Standard and that there was potential for serious detriment to Haringey's tenants.

16.4.6 The RSH has taken the co-regulation approach and will work with the Council as it seeks to remedy these breaches. It will need assurance that the Council is rectifying the issues identified. Where it is not satisfied, the RSH has a range of enforcement powers including imposing penalties, awarding compensation to tenants and censure of employees under s269A Housing and Regeneration Act 2008 where there has been mismanagement.

16.4.7 The Head of Legal and Governance (Monitoring Officer) confirms that there are no legal reasons preventing approval of the recommendations in this report..

## 16.5 Equality

16.5.1 The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- a. Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- b. Advance equality of opportunity between people who share protected characteristics and people who do not.
- c. Foster good relations between people who share those characteristics and people who do not.

16.5.2 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

16.5.3 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

16.5.4 The report and decision are regarding the approval of the attached Housing Service Improvement Plan as set out in the Appendix. This plan sets out how we will improve the council's landlord function and act upon areas for improvement identified in the independent 'state of the nation' report.

16.5.5 Council data shows that people who share certain protected characteristics are overrepresented among current housing tenants. This includes black people, older people, disabled people, women and people from a low socio-economic background.

---

<sup>1</sup> Regulatory notices are issued in response to an event of regulatory importance (for example, a finding of a breach of...a consumer standard that has or may cause serious detriment) that [the RSH], in accordance with [its] obligation to be transparent, wish[es] to make public.

16.5.6 Among other things, the improvement plan focuses on improving tenant involvement and satisfaction, investing in the quality of our homes and prioritising resident safety.

16.5.7 Considering the two points above, it is likely that the improvement plan will positively impact those with protected characteristics.

16.5.8 The Improvement Plan comprises many individual actions and priorities each with varying equalities implications and risks to upholding the public sector equalities duty. Therefore, each action will be subject to individual equalities screening as part of their respective governance and decision-making arrangements. EQIAs will be performed where more significant equalities implications are identified.

16.5.9 At this stage in the delivery plan process, it should be noted that areas of the plan such as repairs service, income collection, parking, reductions in ASB, sheltered accommodation and resident safety can have significant equalities implications and as such future decisions and actions in these areas should be given particular consideration.

## **17 Use of Appendices**

Appendix 1 – Housing Services Improvement Plan

Appendix 2 – Compliance Health Check Report

## **18 Local Government (Access to Information) Act 1985**

–

*7 December 2021* - Decision on the Council's proposal to bring Homes for Haringey (HfH) in-house – link [here](#)

*7 July 2022* – Proposals for Resident Engagement and Participation following the Insourcing of Homes for Haringey – link [here](#)

*31 May 2022* – Special Resolution – link [here](#)