

Report for: Housing, Planning and Development Scrutiny

Title: Preparedness for new Social Housing Consumer Standards

Report authorised by: David Joyce, Director of Placemaking and Housing

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

Ward(s) affected: All

**Report for Key/
Non Key Decision:** For information.

1. Recommendations

It is recommended that the Panel note the report.

2. Describe the issue under consideration

Housing, Planning and Development Scrutiny Panel requested an update on the Council's preparedness for the Regulator of Social Housing's new Consumer Standards, particularly focusing on tackling antisocial behaviour.

3. Background

- 2.1 The Grenfell Tower fire disaster took place on 14 June 2017. This led to one of the most fundamental changes in social housing regulation in decades, with the Social Housing (Regulation) Act being enacted on 20 July 2023. The Act aims to improve the condition of social housing and increase resident safety. It strengthens the right of the resident's voice to be heard. It also greatly enhances the powers of the Regulator of Social Housing (RSH).
- 2.2 The Regulator recently consulted on new consumer standards for social housing. It is anticipated that there will be minimal changes to the standards as a result of the consultation. The new standards are expected to be published in late February/ early March and come into effect from April 2024 alongside the new regulatory regime.
- 2.3 The Regulator has regularly communicated to landlords that they should not wait for publication of the new standards but should be implementing the approach set out in The Charter for Social Housing, the Social Housing White Paper published November 2020 which clearly set out expectations of landlords in respect of safety, and resident engagement.

4. Details

4.1. The current consumer standards are:

- Home
- Tenant Involvement & Empowerment
- Neighbourhood & Community
- Tenancy
- Tenant Satisfaction Measures Standard 2023 (tenant scrutiny)

4.2. These will be replaced by the following consumer standards:

- Safety & Quality
- Transparency, Influence and Accountability
- Neighbourhood and Community
- Tenancy.

4.3. The key differences between the 'old' and 'new' standards are considered to be an increased emphasis on having up-to-date knowledge of the condition of the housing stock down to an individual property level (Safety and Quality standard); and a requirement on landlords to demonstrate an understanding the diverse needs of residents and delivering equitable outcomes to residents across all their services (Transparency, Influence and Accountability standard).

4.4. The new standards are also outcome based rather than prescriptive. They will be supported by a new Code of Practice. The expectation from the Regulator is that landlords *'can meet the outcomes we expect in the most appropriate way for their tenants and their business'*.

Safety and Quality standard

4.5. This covers the following areas: stock condition and quality, including Decent Homes compliance; health and safety; repairs, maintenance and planned improvements; and adaptations for tenants with disabilities.

Transparency, Influence and Accountability standard

4.6. This covers the following areas: fairness and respect; diverse needs; resident engagement; provision of information to residents about landlord services including the consumer standards; and a simple, accessible complaints service.

Neighbourhood and community standard

4.7. This covers maintenance of shared spaces; local cooperation and landlords' strategic responsibilities in working in partnership to promote wellbeing and partnerships; safer neighbourhoods, including having an ASB policy and taking prompt action to tackle this, using the full range of powers available; clearly set out approach to tackling hate crime; and a

policy around domestic abuse, and cooperate and rehouse victims of domestic abuse.

Tenancy Standard

- 4.8. This standard covers allocations and lettings, including letting homes in a fair and transparent way; addressing overcrowding and under-occupation; providing appeals mechanisms; preventing tenancy fraud; having clear policies around tenure; and providing a mutual exchange service; and supporting residents to sustain their tenancies and prevent unnecessary evictions.
- 4.9. The full details of the proposed new standards are set out here: [Proposed Consumer standards \(publishing.service.gov.uk\)](https://publishing.service.gov.uk).

Action Planning

- 4.10. A gap analysis was conducted against the current consumer standards on the Council's behalf by HouseMark, the specialist housing consultancy between November 22 - February 2023, with final reports received March 2023.
- 4.11. Performance against the Home standard was considered to be weak on the following grounds:
- High level of non-decency
 - Need to revise asset management strategy targets and budgets
 - A need to audit building safety compliance
 - Increase the efficiency of the repairs service and improve repairs communications.
- 4.12. This was a secondary confirmation, in addition the external review in December 2022, of the need to improve against this standard, having already referred ourselves to the Regulator. The remaining standards were considered adequate or limited. An action plan was developed against the gap analysis.
- 4.13. The Housing Improvement Plan which was agreed by Cabinet on 14 April 2023 includes a specific action to implement the gap analysis action plan. However, the development of the Plan itself was also influenced by the findings of the gap analysis.
- 4.14. It should be noted that meeting the decent homes standard, resident safety and compliance, and operating an effective repairs service all remain key considerations in the new Safety and Quality Standard.
- 4.15. The Housing Improvement Plan also includes a number of key actions that contribute to the delivery of the current, and new consumer standards, particularly those in respect of:

- Resident led improvement (**Transparency, Influence and Accountability Standard**)
- Improve our repairs service (**Safety and Quality Standard**)
- Improve estates...service (**Neighbourhood and Community Standard**)
- Improved compliance (**Safety and Quality Standard**)
- Investing in our stock (**Safety and Quality Standard**)
- Sheltered housing (**Tenancy Standard**)
- Better management (**Neighbourhood and Community Standard/ Tenancy Standard**).

- 4.16. Delivery of the actions in the Housing Improvement Plan is monitored and reported to the relevant performance boards.
- 4.17. Following the Council's self-referral to the Regulator and confirmation that there had been a breach of the Home standard, the Council has entered into a Voluntary Undertaking with the Regulator. Under this there is monthly progress reporting to the Regulator of performance against an Improvement Action Plan. More details of the Voluntary Undertaking are set out elsewhere on this meeting agenda.
- 4.18. As a result of the self-referral to the Regulator, putting in place improvement plans, and the ongoing engagement with the Regulator, considerable progress has been made in meeting the requirements of the new consumer standards, and particularly the new Safety and Quality Standard. The levels of non-decency in Haringey's stock have been reduced and in November 23 the Council exceeded the target of 1000 homes made decent in 2023/24 agreed with the Regulator. The stock condition survey is due to complete in 2024 which will ensure the data is up to date and enable accurate targeting of investment to achieve and maintain decency. Significant improvements in health and safety compliance have been achieved and this will be further assisted by our purchase of a new compliance management system.
- 4.19. Another key achievement of one of the actions in the Housing Improvement Plan is putting in place a new resident engagement and governance framework which strengthens and broadens the Council's housing resident engagement mechanisms, enabling more residents to participate and have their voice heard and have more of a say in the way housing services are run.
- 4.20. There was an extensive engagement exercise on the new framework. This included promoting the recruitment to the new structures via Homezone, the resident magazine, as well as via the website, letters, texts, emails and social media channels. There were introductory meetings held both face to face and online. There were assessment sessions and one to one feedback. There was an induction day where involved residents met the Cabinet Member, Director of Placemaking and Housing, Operational Director of Housing and Building Safety and Assistant Director of Housing Management. The Council continues to

promote how residents can get involved and has produced a short film in both English and Turkish to assist with explaining what resident engagement means. This is consistent with the requirements of the Transparency, Influence and Accountability Standard.

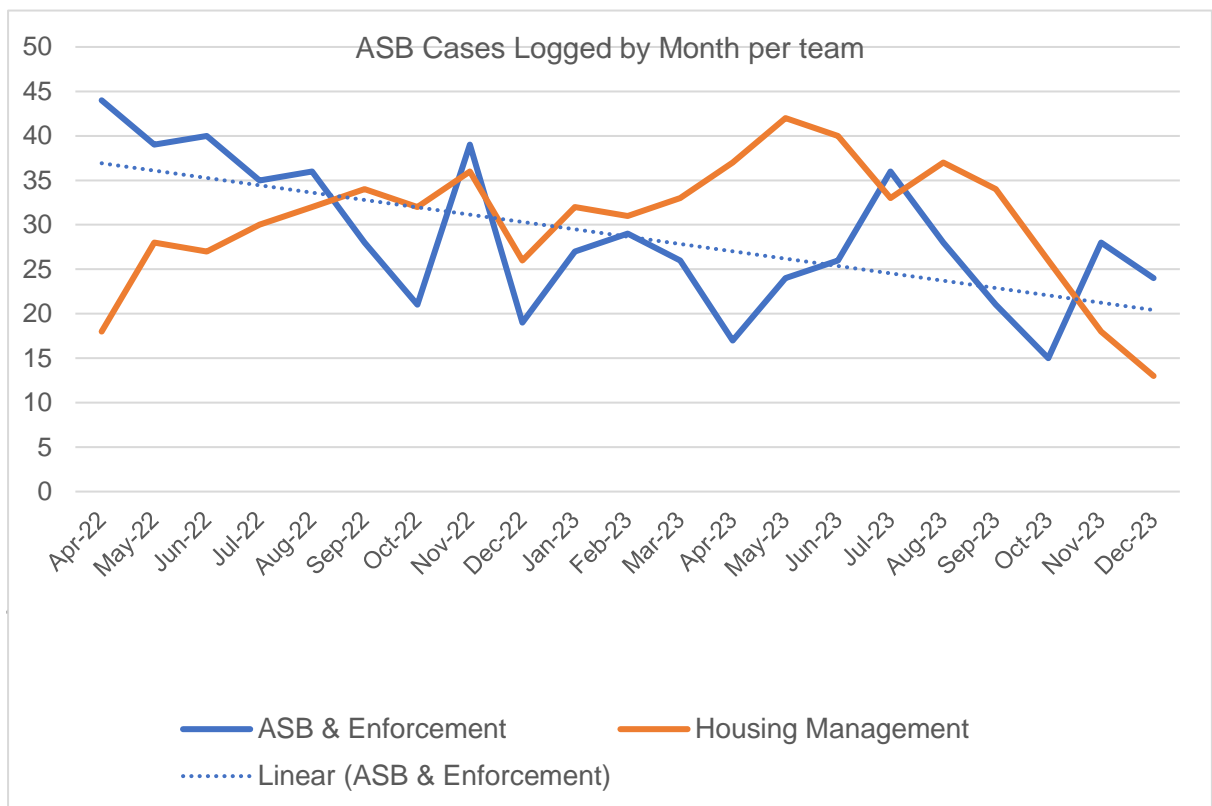
- 4.21. To ensure that we are fully prepared for the implementation of the new consumer standards we are in the process of arranging an awayday for senior managers to conduct a gap analysis and identify key actions to prepare us for housing inspection, to be facilitated by a specialist housing consultancy. The intention is also to arrange for an external organisation to carry out a 'mock' housing inspection later in 2024/25.

Anti-social Behaviour (ASB) Service Improvements

- 4.22. As part of the Housing Improvement Plan and linked to the Regulator's new Consumer Standards, discussions are in progress with Stronger & Safer Communities with regards to a fundamental redesign of the current joint operating model for tackling ASB in council properties and on housing estates.
- 4.23. Under the current arrangement Housing Services pay for an ASB service from the ASB & Enforcement team in Stronger & Safer Communities, under Environment and Resident Experience, which is funded by the Housing Revenue Account (HRA) under the terms of a Service Level Agreement (SLA).
- 4.24. It is important to note that this SLA technically expired in March 2022 and has been in place since April 2019, however the arrangements under this agreement have continued to date. The current arrangement provides for 90% of the cost of the immediate ASB & Enforcement Team, with contributions to other posts within the department and the remaining proportion covered by the General Fund, although this structure differs to what was originally provided in the SLA due to a restructure in the ASB & Enforcement team. The ASB & Enforcement Team is an internal Council Service dealing with ASB both in private sector and local authority housing stock as well as non-tenure related cases, such as businesses and public spaces.
- 4.25. This ASB SLA provides ASB case management for high level cases or where cases require enforcement action. Low level ASB cases are typically managed by Housing Management, and should these cases escalate to requiring more serious intervention or legal action, the ASB & Enforcement team then take over the management of the case on request under the terms of the SLA. The service standards mirror the requirements contained within the ASB policy (2021).
- 4.26. The SLA also includes attendance at estate walkabouts and resident meetings, providing Housing Management with regular articles on successes and case studies, and developing and assisting in providing training. The logging, initial assessment and allocation of ASB cases are

included in the SLA although this is now completed by two Enforcement Support Officers under Direct Services.

4.27. For 2022-23 Tenancy Management were allocated 359 cases, with ASB & Enforcement allocated 383, although it is important to note that not all of ASB & Enforcement's cases will be housing related. For this financial year on case allocation from April 2023 to December 2023, Tenancy Management have been allocated 280 cases which is an increase of 17 for the same period from 2022-23, and ASB & Enforcement allocated 219 which is a decrease of 82 cases. There is a general trend from April 2022 of the number of cases logged to ASB & Enforcement decreasing which can be seen in the graph below. It is important to note that the cases allocated to ASB & Enforcement will not all be housing related.



comparisons. The ASB review and associated work will continue to ensure value for money and that a quality service is delivered to residents that meets the standards required of us as a landlord.

4.29. Changes in how ASB is monitored, and services are delivered are already underway, with reporting from Enforcement being improved upon, and reporting against key KPIs has been put in place on a monthly basis going forward.

4.30. Housing Services are also seeking resident feedback on how we can improve our services through the new CIG (Continuous Improvement Group) which meets quarterly for Tenancy Management, and the way in which the ASB process is delivered to and shared with residents is under

review. Improvements to this service is a high priority for the 24/25 financial year.

- 4.31. We are building our links with residents and ensuring we take on board their views on what the main issues are in the Borough and what they feel the best solutions would be. This is particularly important for our more challenging estates such as Broadwater Farm and Northumberland Park, where we currently have a regular on-site presence from all aspects of the tenancy/housing management team. This enables greater oversight of the issues on these estates and more swift action when an incident takes place. Further, this ensures that we have strong links with the local community and that residents feel they can approach us to discuss any concerns or local issues.
- 4.32. Parking is also a common cause of lower level ASB complaints and neighbour disputes, particularly where individuals park a large number of vehicles on an estate, causing issues for others parking. For this reason, a new parking enforcement scheme was agreed by Cabinet on 16 January 2024, utilising traffic management orders to enforce parking restrictions on our estates; therefore, resolving many of the issues residents experience with parking.
- 4.33. We have recently focused on improving our approach to vulnerable tenants and safeguarding issues identified in our properties which has been done in conjunction with the Housing Ombudsman. This work will be continuing and in addition provides a good foundation on which we aim to regain DAHA (Domestic Abuse Housing Alliance) Accreditation. This project has just been initiated across various teams within the Council as it will be a Council wide application, with the expectation for assessment to be in around 12 months. Working towards the DAHA accreditation will immediately indicate our commitment to delivering safe and effective responses to domestic abuse which is based on understanding and responding to the individual needs of people experiencing domestic abuse, and again supports the new focus on domestic abuse in the consumer standards.

Safer Estates

- 4.34. This service was introduced as a pilot in 2018 specifically to address the escalating crime and anti-social behaviour (ASB) issues on the Love Lane Estate. The service consisted of 60 4K definition cameras and 3 door entry systems. Within the first 3 months of operation there was a 71% reduction in rough sleeping, 65% reduction in prostitution, 64% reduction in alcohol consumption within the external communal areas, 62% reduction in drug use, 60% reduction in criminal activity and 48% reduction in fly tipping.
- 4.35. In 2019 Safer Estates was formally brought into Estates & Neighbourhoods and an annual expansion programme commenced. 79 separate locations are covered. The service consists of:

- 595 cameras, and operating systems
- 4 door entry systems
- 6 public address systems, and operating systems
- 4 rapid deployment cameras
- 160 radio transmitters
- Systems for recording and retaining camera footage for 31 days.

4.36. In addition to providing a deterrent to crime and ASB, creating a safer environment for residents, the service provides clear 'evidentiary' quality footage enabling the police and the Council's Enforcement Team to take enforcement action against perpetrators of crime, ASB and fly tipping. Footage is also shared with the Police where the threshold for criminal activity is met.

5. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes'?

5.1. By complying with the Regulator's consumer standards Housing Services and Building Safety are contributing to meeting Theme 5 of the Corporate Delivery Plan – Homes for the Future, particularly the following outcome: **An improvement in the quality of housing and resident services in the social rented sector.** The measures to tackle antisocial behaviour in council homes and on estates are contributing to Theme 6 – Safer Borough 'a borough where all residents and visitors feel safe and are safe'.

6. Carbon and Climate Change

6.1. By complying with the Regulator's Safety and Quality standard, particularly in respect of compliance with the Decent Homes standard, the Council will be improving the thermal efficiency and comfort of its council stock and making other improvements to the condition and quality of its homes to make it more efficient to manage and maintain for both the Council and residents.

7. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Not required on the advice of the Principal Scrutiny Officer.

7.1. Procurement

Not required.

7.2. Head of Legal & Governance [Name and title of Officer completing these comments]

Not required.

7.3. Equality

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

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

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.

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

The Regulator's new Consumer Standards, particularly the Transparency, Influence and Accountability standard are likely to have a positive impact on Haringey council tenants as there is a requirement for landlords to 'understand the diverse needs of tenants, including those arising from protected characteristics, language barriers, and additional support needs' and 'assess whether all tenants have fair access to, and equitable outcomes of, housing and landlord services. Additionally, the standard requires that landlords must ensure that their services are accessible.

8. Use of Appendices

None.

9. Background papers

Government's proposed consumer standards: [Proposed Consumer standards \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

The Charter for Social Housing; [The charter for social housing residents: social housing white paper \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)