



REPORT TO:	Cabinet
DATE:	16 July 2024
SUBJECT:	Social Housing Regulation – Q1 2024/25 review
PURPOSE:	To provide Cabinet with an update on progress made towards delivering the outcomes of the Social Housing (Regulation) Act 2023, including revised consumer standards.
KEY DECISION:	No
PORTFOLIO HOLDER:	Portfolio Holder for Strategic and Operational Housing
REPORT OF:	Jason King, Assistant Director - Housing
REPORT AUTHOR:	Vikki Cherry, Housing Transformation Programme Manager Vikki Cherry
WARD(S) AFFECTED:	(All Wards);
EXEMPT REPORT?	No

SUMMARY

The Regulator of Social Housing adopts a co-regulatory approach, holding Councillors responsible for ensuring that the Council, in its role as a registered provider of social housing, is delivering the outcomes of consumer standards.

This paper reflects on the changes introduced by the Social Housing (Regulation) Act 2023 and the Council's progress towards delivering the outcomes of the consumer standards.

RECOMMENDATIONS

That Cabinet notes the work underway to align services with the new regulatory regime and notes the Council's progress towards delivering the outcomes of the consumer standards.

REASONS FOR RECOMMENDATIONS

To provide assurance to Cabinet on the Council's preparations for regulatory inspection and provide updated information on ongoing work towards delivering the outcomes of the consumer standards.

OTHER OPTIONS CONSIDERED

Do nothing – to retain progress updates through operational arrangements with the Portfolio Holder for Strategic and Operational Housing. This option is not considered to be appropriate as the Regulator of Social Housing is clear that Councillors are responsible for ensuring that the Council, in its role as a registered provider, is meeting the regulatory standards set.

1. BACKGROUND

- 1.1 Managing over 3,800 properties, South Holland District Council is the largest Registered Provider in the district. From 1 April 2024, expectations on Registered Providers changed, with a focus on property condition, tenant experience and accountability. Registered Providers face the challenge of ensuring they get the basics right whilst contributing to the wellbeing of tenants and communities. Balanced with an increase in oversight and scrutiny from the media, the Housing Ombudsman and the Regulator of Social Housing.
- 1.2 In preparation for the changes in the social housing sector, the Council has:
- commissioned an external Health Check to assess and report on the landlord function of the authority.
 - carried out a self-assessment against the Consumer Standards
 - adopted a Housing Landlord Strategy and Transformation and Improvement Programme (and recruited a Housing Landlord Transformation and Improvement Team).
- 1.3 The Social Housing (Regulation) Act 2023 delivered a number of key changes, including allowing the Regulator of Social Housing (RSH) additional powers. These changes:
- Strengthened the regulator's enforcement powers, making it easier for them to intervene where they believe that landlord services are failing tenants.
 - Placed the relationship between the regulator and the Housing Ombudsman's Service on a statutory footing.
 - Extended the regulator's powers, paving the way for the introduction of revised consumer standards, covering all aspects of landlord services.
 - Introduced a pro-active regime of inspections, inspecting all landlords with other 1,000 units a minimum of once every four years.

2 REPORT

2.1 Consumer standards

- 2.2 Social housing landlords must meet revised consumer standards set by the Regulator of Social Housing. The standards came into force in April 2024. The Regulator is not prescriptive about how landlords should achieve the required standards, instead emphasises that landlords should work with tenants to define the services and approaches that meet tenants needs and service expectations, agreeing them on a local level.

3. Position statement for the consumer standards

Consumer Standard	Steps achieved towards compliance with this standard	Areas identified where work is ongoing
<p>The Safety and Quality Standard</p> <p>Requires landlords to provide safe and good-quality homes for their tenants, along with good-quality landlord services.</p>	<ul style="list-style-type: none"> • Established performance reporting clinics with performance data reported monthly at Housing Compliance Clinic (attendees including the Deputy Chief Executive (Corporate Development) and s151 Officer, and Portfolio Holder for Strategic and Operational Housing), and quarterly at Corporate Governance Clinic, SLT and Performance Monitoring Panel. • Contracts in place to complete programmed gas, water, lift, fire and asbestos safety checks. • Ongoing capital programme to continuously invest in homes and keep them 'decent'. • Procured a contract for all properties to be surveyed over the next 12 months. • Awarded a contract for an Asset Management Strategy to be produced. • Established a Damp, Mould and Condensation officer working group. • Appointed a Lead Officer for Health and Safety and Person Responsible for Fire Safety. • Awarded a contract for Sheltered Housing pull cord alarm system upgrade in response to the digital switchover. • Quality assurance arrangements in place to ensure valid certification in place for compliance works. • Programme of contracts in place for all external contracts, with value for money demonstrated as part of procuring contracts. • Reviewed Service Level Agreements with Council departments including Facilities and Parks and Grounds around managing and cleaning communal areas. 	<ul style="list-style-type: none"> • Deliver a programme of property stock condition surveys and determine appropriate intervals for future surveys. • Enhance case management of no access cases. • Embed continuous service improvements for reports of damp, condensation and mould. • Deliver an Aids and Adaptations policy, involving tenants. • Adopt an Asset Management Strategy. • Enhance our service provision in response to Awaabs law, with legislated timescales to carry out repairs to hazards including damp and mould – final detail still to be determined by DLUHC and Regulator of Social Housing. • Review Repairs policy, considering tenants views and diverse needs. • Report arrangements determined on informing Members and Senior Officers on disrepair, Housing Ombudsman and Building Safety Regulator findings. • Enhance communication with tenants for major repairs where work is outsourced – confirming start and completion dates. • Timescales and priorities for repairs reviewed – responses to take into account protected characteristics. • Online reporting of repairs rolled out (in addition to telephone option).

Consumer Standard	Steps achieved towards compliance with this standard	Areas identified where work is ongoing
<p>The Transparency, Influence and Accountability Standard</p> <p>Requires landlords to be open with tenants and treat them with fairness and respect so they can access services, raise concerns when necessary, influence decision making and hold their landlord to account.</p>	<ul style="list-style-type: none"> • Established performance reporting clinics with data and information reported regularly to Housing Governance Clinic, Corporate Governance Clinic, SLT and Governance and Audit. • Awarded a contract for a HRA Business Plan to be produced. • Carried out a tenant census (in 2023) including capturing protected characteristics and updating our database. • Produced a procedure on self-referrals to the Regulator. • Established a Complaints Working Group where Officers review trends and themes around complaints. • Reviewed the Housing Complaints policy to ensure that it meets the new Housing Ombudsman Complaints Handling Code. • Brought management of complaint handling temporarily into Housing to meet the Housing Ombudsman's timescales. • Adopted an operational risk register and a standalone corporate risk register for the HRA. • Included objectives around professionalism in PDR's 2024/25 • Reviewed the Sheltered Housing Offer resulting in additional staff on our estates to monitor wellbeing and greater transparency around service charges. • Adopted best practice by including Equality Impact Assessments as standard for all policies and projects across the service. • Established tenant focus groups with sheltered housing tenants, shaping service improvement. • Produced a tenant engagement framework (2023) • Appointed (and published) statutory roles. • Published information around how we spent tenant's rent in 2023/24 and senior salaries charged to the HRA. • Produced a Landlord Strategy and Transformation Programme • Published an annual report to tenants (summer 2024.) • Procured a contract to re-engineer our tenant participation offers during 2024/25. • Organised a "Meet the Housing Ombudsman" event for October 2024 (postponed from June due to Elections). 	<ul style="list-style-type: none"> • Identify further opportunities to give tenants a more meaningful role in monitoring and scrutinising performance. • Review long-term arrangements with complaint handling, determining whether it should remain in Housing (rather than being managed corporately) – reviewing corporate arrangements and charges. • Establish a variety of mechanism for tenants to engage, making sure that the tenant voice is captured, helps inform design and there is an effective feedback loop in place. • Produce a landlord vision with tenants and deliver an engagement strategy. • Enhance Tenant Satisfaction Measure surveys contract, requesting that the contractor holds focus groups with this reporting dissatisfaction to understand more, whilst remaining anonymous. • Take steps to source outstanding data from our tenant census including protected characteristics and importing this to the housing management system. • Use tenant census data to adapt services and communications to meet individual tenant needs. • Enhance service levels to ensure tenants' lived experience actively informs service improvements. • Ensure staff continue to exhibit appropriate behaviours and attitudes towards tenants in line with the competence and conduct standard. • Support tenant led activities and secure a budget.

Consumer Standard	Steps achieved towards compliance with this standard	Areas identified where work is ongoing
<p>The Tenancy Standard</p> <p>Sets requirements for the fair allocation and letting of homes, as well as requirements for how tenancies are managed by landlords.</p>	<ul style="list-style-type: none"> • Undertaken a tenant census gathering up to date data profile of household occupancy. • Arrangements in place for third party authority allowing tenants to nominate a representative to act on their behalf. • Adopted a new Allocations and Lettings Policy in 2024, including an approach to letting accommodation with adaptations and under-occupying/overcrowding. • Conducted a thorough review of all allocations and lettings paperwork in 2023. • A procedure in place for court hearings and evictions to be approved by management before proceeding. • Established a Cost of Living Support Team, to help tenants sustain their tenancies. • Established a Housing Assessment Panel, reviewing Allocations Policy appeals, attended by private registered providers. • Arrangements in place to submit data as required via CORE system and collate data around tenancy terminations. • Established a procedure for managers to sign off tenancy enforcement (before court action), including Proportionality Notices for all tenancy possession cases, logging vulnerabilities and additional steps taken before taking legal action. • Arrangement for sharing information with Housing Options as part of possession proceedings. • A free mutual exchange service available to tenants (online service). 	<ul style="list-style-type: none"> • Establish arrangements to review third party authority arrangements on a regular basis to protect tenants. • Strengthen quality assurance of lettings and nominations, and case management of tenancy support cases. • Data reporting on themes and trends of tenancy support cases to tailor service improvements • Customer experience surveys to be completed when notice is received from tenants. • Long term arrangements for provision of tenancy support service. • Revised Tenancy Management Policy and Tenancy Strategy. • Enhance the mutual exchange service for tenants that require support. • Review mutual exchange paperwork with tenants. • Review communications with tenants around tenancy terminations to ensure it is clear and support is clearly offered. • Publish data on allocations and lettings including appeals and outcomes. • Review lettings criteria for sheltered housing, following the new service offer going live in July 2024. • Determine levels of under occupancy/overcrowding, producing a policy to assist tenants to move. • Enhance monitoring of introductory tenancies including quality assurance regarding home visits and administration of tenancies. • Produce a Tenancy Fraud policy including a programme of property inspections and tenancy fraud checks, as well as data reporting. • Lettings process and literature reviewed with tenants.

Consumer Standard	Steps achieved towards compliance with this standard	Areas identified where work is ongoing
<p>Neighbourhood and Community Standard</p> <p>Requires landlords to engage with other relevant parties so that tenants can live in safe and well-maintained neighbourhoods, and feel safe in their homes.</p>	<ul style="list-style-type: none"> • Reviewed Service Level Agreements with Council departments including Facilities and Parks and Grounds around managing and cleaning communal areas. • Completed a sheltered housing service review enhancing the oversight of communal area management and transparency of service charges. • A programme in place for annual estate inspections completed by Housing Officers. • Delivered Customer Contact Team training and revisions to scripts. • Delivered enhanced safeguarding training to all Housing staff in 2023. • An established Sanctuary Scheme supports victims of domestic abuse to feel safer in their home e.g. additional locks installed, security lighting etc. • Enhanced arrangements around risk assessing domestic abuse cases, with support from the SELCP Domestic Abuse Officers. 	<ul style="list-style-type: none"> • Adopt a Service Level Agreement with Community Safety Team and complete further reviews of SLA's to determine whether additional services are required. • Deliver more frequent estate inspections on a programmed basis, involving tenants. • Develop a suite of policies including a Domestic Abuse Policy, Anti-social Behaviour Policy, Hate Crime Policy and Under-Occupancy Policy. • Introduce more dynamic KPIs around neighbourhood and communal area management. • Improve case management of anti-social behaviour cases (including KPI's), working closer with partnership agencies and tenants to tackle anti-social behaviour. • Improve case management and oversight of domestic abuse and safeguarding cases. • Work with relevant partners to promote social, environmental, and economic wellbeing in the neighbourhood.

4 Rent standard

4.1 Social housing landlords must meet the rent standard, set by the Regulator of Social Housing. This standard determines the required outcomes on how registered providers set and increase rents for their social housing stock in line with government policy. A rent standard is published annually by the Regulator confirming the maximum rent adjustment for the following financial year.

5 Position statement for the rent statement

5.1 An annual data return based on the rent model has been submitted to the Regulator of Social Housing (Local Authority Data Return, LADR) confirming data as of 31/3/2024. This has been validated by the Regulator of Social Housing.

6 Tenant Satisfaction Measures

- 6.1 Tenant Satisfaction Measures (or TSMs as they are commonly known) form an additional standard in this suite of requirements.
- 6.2 TSMs are formed of a series of 22 indicators that have been designed by the Regulator to provide a cross section of information about both the performance of the landlord (based on topics including compliance and safety and repairs timescales) and the perception of the service from tenants. There are 10 service specific performance indicators, and 12 tenant perception indicators, assessing the views of tenants about the services they receive.
- 6.3 2023/24 is the first year that landlords have been required to collate satisfaction data. The survey must ask a series of set questions using a prescribed methodology to ensure the results from a representative sample of the tenants.

7 Position statement for Tenant Satisfaction Measures

- 7.1 2023/24 submission
- 7.2 Tenant surveys were carried out independently in October 2023, with 522 tenants surveyed across a variety of demographics, living in a variety of geographical areas of the district. The headline survey response was that 73% of tenants surveyed were satisfied with the service provided by the Council, in its role as a landlord. Highest scoring areas included: 84% of tenants surveyed reporting that they were treated fairly and with respect and 86% satisfied that the Council provided safe and secure housing. Areas of dissatisfaction included complaint handling at 27% (although this should be considered as service requests, rather than formal complaints) and 50% of tenants satisfied with how we deal with complaints of anti-social behaviour. We intend to establish focus groups with tenants to understand how we can improve in these areas.
- 7.3 Performance data has been reported as of 31/3/2024. Areas of strength include compliance, with 100% reported for gas, fire, water, lift and asbestos safety. Areas for improvement include complaint handling (responding to complaints within Housing Ombudsman timescales) with only 48% of stage 1 complaints responded to within set timescales.
- 7.4 Survey responses and performance data has been submitted to the Regulator of Social Housing. The findings for 2023/24 have been shared with tenants as part of their annual report (sent to all tenants) and uploaded onto the website. Data has been informally shared with Members as part of Transformation Programme briefings and will be presented to Performance Monitoring Panel in December 2024, following the publication of national data from the Regulator of Social Housing in the autumn.
- 7.5 2024/25 submission
- 7.6 From 1 April 2023, TSMs are required to be produced on an annual basis. We are in the process of procuring a contract to deliver this work over the next 3 years. The survey responses are required to be anonymous, however we will be requesting additional work

as part of the contract specification for 2024/25, requesting that focus groups are held with dissatisfied tenants to allow us to explore their concerns further whilst ensuring that the data remains anonymous.

8 Housing Ombudsman Complaint Handling Code (1 April 2024)

- 8.1 The Social Housing (Regulation) Act 2023 also empowered the Housing Ombudsman to issue a new Code of Practice, setting out details of the processes that landlords should have in place for handling complaints.
- 8.2 Published in April 2024, the new Housing Ombudsman Complaint Handling Code includes the role of the Ombudsman to monitor compliance through checking that landlords have:
 - up to date practices in place that comply with the Code when handling complaints;
 - scrutinised and checked their adherence to the Code; and
 - published the outcome of this check on their website.
- 8.3 The Code introduced the following key changes
 - Landlords must accept complaints referred to them within 12 months of the issue occurring or when the individual became aware of it (extended from 6 months).
 - Landlords must undertake and submit an annual self-assessment statement to the Housing Ombudsman.
 - Registered Providers must have a Member Responsible for Complaints, as well as a senior officer who responds to complaints.
- 8.4 Where a landlord does not meet the requirements of the Code, and fails to correct this within a reasonable timescale, the Ombudsman can issue a Complaint Handling Failure Order (CHFO). The CHFO will be shared with the Regulator of Social Housing and published on the Ombudsman's website.

9. Position statement for the Housing Ombudsman Complaint Handling Code

- 9.1. Amendments have been made to the Council's Housing Comments, Compliments, Complaints and Compensation policy and procedure has been updated to reflect additional changes required to meet the Code dated 1 April 2024. A self-assessment against the new Code has been produced and uploaded onto the website.
- 9.2. Arrangements have been established to provide greater oversight over complaints and learnings from them. A Lead Officer for Housing Complaints and a Member Responsible for Complaints have been appointed. An Officer Working Group has been established to identify themes and trends of complaints and drive service improvement in response to them, making recommendations to the Housing Governance Clinic and Member Responsible for Complaints. The Group also supports compliance with the Housing Ombudsman Complaint Handling code.
- 9.3. Data on complaint handling timescales is reported to the monthly Housing Compliance Clinic and information on trends, themes and learnings as well as and recommendations from the Housing Complaints Working Group are reported to the Housing Governance Clinic on a quarterly basis. A Housing Complaint Handling Performance Report is also produced sharing data and information around complaint handling and performance with the Member Responsible for Complaints.

- 9.4. During 2023/24, complaint handling timescales exceeded the Housing Ombudsman prescribed timescales, resulting in non-compliance with the Code. In response to this, complaint handling was brought into the service in February 2024, rather than continuing with the existing arrangement within corporate services. This was a temporary arrangement and was necessary as the Housing Ombudsman Code allows five less working days than the Local Government and Social Care Ombudsman Code. Since making this change, the department has reported 100% of complaints responded within the timescales, however consideration needs to be made around the long-term approach for complaint handling including a review of recharges to the HRA.
- 9.5. An Annual Complaints, Performance and Service Improvement report has been drafted summarising complaints themes, trends and improvements for 23/24. Once approved, this will be published with tenants.

10 Competence and Conduct Standard

- 10.1 This standard ensures that all staff have up-to-date skills, knowledge and experience, and that they exhibit the right behaviours to deliver a high quality, professional service and treat residents with respect.
- 10.2 The Government is yet to issue its final direction to the Social Housing Regulator on the contents of a new Competence & Conduct Standard, which will apply to all registered providers of social housing. Whilst the final detail is yet to be determined, the Social Housing (Regulation) Act 2023, sets out:
- A requirement for registered providers to have a written HR policy for managing the skills, knowledge, experience, learning and development, and conduct of all their staff (including appraising staff and managing poor performance). (This document is required to be tailored to roles within the Housing Service).
 - Adoption of a code of conduct, tailored to Housing roles, ensuring staff are displaying the right behaviours, attitudes and empathy to tenants.
 - Mandatory qualifications - Senior housing managers and executives must undertake qualifications in housing management with 50% to be enrolled by April 2026 and all qualified by April 2028. Through voluntary engagement, the Council can demonstrate compliance with initial requirements.

11 Position statement on the Competence and Conduct Standard

- 11.1 Discussions have been held with the Head of Human Resources and Organisational Development, Assistant Director - Corporate and the Monitoring Officer regarding the requirements of the standard, from a HR perspective. An additional HR policy and Code of Conduct is required in order to meet the standards. A presentation is scheduled for discussion at July's Workforce Development Board to determine the next steps.
- 11.2 It has been determined that all Housing Managers and the Assistant Director - Housing (totalling 6 Officers) are required to achieve additional qualifications in housing management. Four officers (Housing Services Manager, Business Support Manager, Housing Transformation Programme Manager and Assistant Director-Housing) are enrolled to commence their studies in September. The Housing Repairs Manager will

commence studying upon a date being released by Chartered Institute of Housing, and the remaining officer relates to the vacant Housing Property Services Manager post. At point of recruiting, the job description will be amended to require applicants to have the required qualification/be willing to study within 12 months of starting employment.

- 11.3 There are plans for further housing staff to enrol in the future as part of their professional development. The service continues to offer training at all levels in a range of disciplines, for example in housing, management and leadership and building surveying. Continuous Professional Development will be monitored as part of annual staff appraisals and one to ones.

12 Housing Landlord Strategy and Transformation and Service Improvement Programme update

- 12.1 Cabinet adopted a Landlord Strategy and Housing Transformation and Improvement Programme Mandate in February 2024.

- 12.2 The following progress has been made towards delivering the Strategy:

- Culture and Operational Excellence - Complaints Working Group established. Partnership working including establishing the Programme Board with a variety of Assistant Directors involved. Managers enrolled to complete Housing Management qualifications. Governance Framework drafted allowing greater oversight from Members and SLT. Regular briefings held with a variety of Officers across the Partnership.
- Quality Homes and Connected Neighbourhoods – contract awarded to survey the condition of all properties, ongoing investment in improving emergency efficiency, staff briefing on how they can support tenants to reduce their running costs, contract awarded for HRA Business Plan and Asset Management strategy.
- Accountability and Transparency – Tenant Satisfaction Measure findings published, annual report drafted, Housing Compliance Clinic established to monitor performance, data benchmarking arrangements established.
- Tenant Voice and Opportunity – contract awarded to reengineer our tenant engagement offering.

- 12.3 The Programme is currently on track with progress monitored by the Housing Landlord Transformation and Improvement Programme Board, sponsored by the Deputy Chief Executive (Corporate Development and s151 Officer. Meetings are held quarterly and chaired by the Portfolio Holder for Strategic and Operational Housing.

- 12.4 Projects are progressing as follows:

- Governance project (commenced December 2023) – Multitude of reporting arrangements established for Members and Senior Officers to have oversight of performance of the service. Portfolio Holder decision made to appoint individuals as Responsible Persons. Risk management improved with a new risk register established, and externally scrutinised. KPIs established and monitored monthly at relevant Housing Clinics. Service Level Agreements reviewed with SECLP departments (for 24/25). Governance framework drafted for adoption by Cabinet autumn 2024, following consultation with Policy Development Panel. HRA Business Plan and Asset Management Strategy contract awarded. Membership established for Housemark (to allow for Benchmarking).

- Complaint handling project (commenced March 2024) – Officer Working Group established along with arrangements to regularly report themes, trends, learnings and improvements to Members and Senior Officers. 2023/24 Feedback report produced. Complaints policy updated to meet new Ombudsman Code and self-assessment published. Responsible Person roles appointed.
- Tenant Engagement project (commenced May 2024) – contract awarded for re-engineering engagement piece. Tenant Satisfaction Measures published with tenants for 2023/24. Annual report produced for 2023/24.
- Data efficacy project (commenced June 2024) – project proforma drafted and action plan created for adoption by Housing Managers and the Programme Sponsor.

13 Responses submitted to DLUHC/Housing Ombudsman consultations

- 13.1 Officers have responded to a variety of consultations on behalf of the Council over the last six months. The Portfolio Holder for Strategic and Operational Housing, and Deputy Chief Executive (Corporate Development) and s.151 Officer are briefed on consultation responses along with the anticipated impact to the Council. Cabinet will be provided with a further update once consultation findings have been published.
- 13.2 Competence and Conduct Standard (DLUHC)
- 13.3 As mentioned earlier in the report, this standard aims to introduce a national framework for promoting high standards and professionalism within the social housing sector through the introduction of new measures on professionalisation including requiring people who deliver social housing services to have, or gain, specific qualifications related to their work.
- 13.4 Officers predominantly supported the consultation proposals, however, like the sector, requested additional time to deliver them. Further clarity was requested, specifically for local authorities, to ensure that the proposals do not disproportionately impact a whole department when compared against the wider workforce. Clarification was also requested around funding arrangements for courses and whether the apprenticeship levy would be accessible.
- 13.5 Awaab’s Law: Consultation on timescales for repairs in the social rented sector (DLUHC)
- 13.6 Awaab’s Law was introduced within the Social Housing (Regulation) Act 2023 requiring registered providers to comply with new requirements around damp, condensation and mould.
- 13.7 Awaab’s Law focuses on the obligations of registered providers to ensure properties are free from damp and mould and also many other hazardous conditions. The consultation sought views on the specific timescales by which a registered providers will be required to respond to complaints of certain health and safety hazards.
- 13.8 Officers predominantly agreed with the proposals around responding to reports of damp and mould, however raised concerns about timescales being set in calendar days as they seem unworkable during periods where there are extended bank holidays such as Easter and Christmas. Officers are reviewing additional steps required to deliver the expectations around responding to damp and mould.

- 13.9 The Council, and sector, raised concerns about the proposals to broaden the scope of Awaab's Law to include all 29 hazards in the Housing Health and Safety Rating System (HHSRS) risks. This would place unsustainable pressure on (Council and private) surveyors and other specialists qualified to assess whether each hazard presents a serious risk of harm. It could also overwhelm rapid repair resources with issues already covered by existing legislation and processes. In addition, certain hazards such as (natural) overcrowding, are outside of landlord's control.
- 13.10 Reforms to Social Housing Allocations (DLUHC)
- 13.11 The consultation proposed various changes to the allocation system, prioritising individuals with a strong connection to the UK. It aims to introduce measures to address anti-social behaviour or crimes related to terrorism.
- 13.12 Concerns were raised around the impact of stricter eligibility criteria for social housing unintentionally leading to an increase in homelessness, putting more pressure on the general fund. Revisions would be required to the Council's Allocations and lettings policy and procedure, along with the approach to monitoring antisocial behaviour in order to administer requirements. Officers had concerns about managing the communication with victims of anti-social behaviour regarding a "three strikes and you're out" policy, considering the timescales for courts to consider cases at present. (Councils already have the possibility to set policies on allocations at local level, this includes restrictions on those with criminal convictions and history of anti-social behaviour, of which the Council's policy covers).
- 13.13 2024-25 Business Plan Consultation (Housing Ombudsman)
- 13.14 The Business Plan covers the final year of the Ombudsman's 2022-25 Corporate Plan, which aims to deliver an independent, visible and proactive service for social housing residents and landlords. The Business Plan sets out how the Ombudsman will develop its role in light of system changes and significant increases in demand – by working to improve local complaint handling, by implementing its remaining new powers and by delivering the remaining work on its strategic programmes. The Ombudsman sought views on what learning tools it can provide to support landlords in improving their complaint handling and to test support for changes to the fee regime to incentivise better complaint handling.
- 13.15 Officers requested the following learning tools:
- Continuation of spotlight reports/ Lessons learnt
 - Recording templates
 - Housing Ombudsman representative to support landlords
 - Training packages (webinars, face to face, workshops)
 - Trend and performance clinics by landlord size/region
 - Facilitation of working groups between landlords to share ideas and best practice.
- 13.16 Additionally, officers proposed the following support from the Housing Ombudsman:
- An Ombudsman representative to work with landlords to establish what good looks like.

- a report explaining the definition and the classifications of maladministration orders and factors determining whether it was severe or not.
- Compensation calculations and harmonised expectations between landlords and the ombudsman.
- Improved communication throughout the complaint investigation between the ombudsman and the landlord.
- Performance information of the ombudsman (response timescales) with the Ombudsman setting timescale response times for the tenant and landlord, communicating throughout.

13.17 Good Practice Consultation (Housing Ombudsman)

13.18 A consultation for social housing landlords on the Ombudsman’s proposed approach for issuing Good Practice and potential topics. The Social Housing (Regulation) Act 2023 gives the Ombudsman the power to issue guidance to scheme members on good practice in the carrying on of housing activities. The Ombudsman sought feedback on potential topics to be covered.

13.19 Officers requested that more good practice was made available specific to local authorities, along with a tracking system in order for landlords and tenants to monitor cases open to the Ombudsman.

14. CONCLUSION

14.1. The legislative and regulatory changes which have been introduced are significant and wide-reaching, impacting the operational and strategic approaches taken in delivering housing services in the future, including where funds are allocated, the range of data collected and the way our tenants are involved in all that we do.

14.2. To summarise, the following have been RAG rated:

Item	RAG rating	Comments
Consumer Standards	Amber	Our assessment does not highlight issues of material concern, however there are areas for improvement including tenant engagement and scrutiny (first phase of work commenced), stock condition data (contract awarded to survey all stock), updating the HRA business plan (contract awarded), producing additional policies (with tenants), taking additional steps to adjust our service offer for those with protected characteristics.
Rent standard	Green	Data submitted for 2024/25
Tenant Satisfaction Measures	Green	Data submitted to Regulator and published with tenants. Being discussed at PMP in December following Regulator publishing national data in the autumn. Contract being procured for 2024/25

Housing Ombudsman Complaint Handling Code		Policy updated and self-assessment completed. End of year reflection document drafted.
Competence and conduct standard		4 out of 6 Officers enrolled onto qualification. HR policy and Housing Code of Conduct to be produced.

- 14.3. Vast progress has been made over the last six months strengthening delivery towards the requirements of the Social Housing (Regulation) Act 2023. The progress of the Housing Landlord Service continues to be monitored by the Housing Transformation and Service Improvement Programme Board (sponsored by the Deputy Chief Executive (Corporate Development) and s151 Officer and chaired by the Portfolio Holder for Strategic and Operational Housing). Service performance continues to be monitored by the Assistant Director Housing and reported through the newly established Housing Compliance and Housing Governance Clinic, followed by formal scrutiny oversight.
- 14.4. Tenant scrutiny and opportunities for engagement continue to highlight gaps, however this will begin to be addressed as part of the re-engineering engagement piece of work scheduled to commence during the summer of 2024.
- 14.5. Work will continue throughout the year to strengthen the position with updates provided to Cabinet on a quarterly basis.

15. EXPECTED BENEFITS TO THE PARTNERSHIP

- 15.1. There are no immediate benefits to the Partnership. However, South Holland as a sovereign partner Council continues to contribute to the overall reputation of the Partnership. Therefore, continuing to show preparedness for an upcoming external inspection will support the Partnership's reputation.
- 15.2. The Housing Transformation Team are working with a cohort of Future Leaders including their attendance at Housing Clinics and Officer Working Group to act as a critical friend.

16. IMPLICATIONS

16.1. SOUTH AND EAST LINCOLNSHIRE COUNCILS PARTNERSHIP

16.2. None.

16.3. CORPORATE PRIORITIES

16.4. None.

16.5. STAFFING

16.6. The Transformation Programme will involve a review of the resourcing and skills of the Landlord Service and arrangements where other Council departments provide services for

the Housing landlord Service (funded by the Housing Revenue Account). A paper on resources will be brought to Members in due course.

16.7. The competence and conduct standard requires a Housing landlord specific HR policy and code of conduct. This will affect all Housing staff.

16.8. **WORKFORCE CAPACITY IMPLICATIONS**

16.9. Housing Managers and the Assistant Director – Housing are required to complete qualifications in Housing Management in order for the Council to deliver the outcomes of the competence and conduct standard. Whilst officers are committed to completing the qualifications, it should be noted that the Chartered Institute of Housing advises that the study requires a commitment of 8 hours per week to be completed (over a period of 12 months).

16.10. Due to increased publicity on complaints by the Council (as required by the Complaint Handling Code) and the Housing Ombudsman, the volume of housing related complaints has increased. 38 stage one complaints and 6 stage two complaints were received between 1 April - 30 June 2024, compared with 37 stage one and 0 stage two for the total of 2023/24.

16.11. **CONSTITUTIONAL AND LEGAL IMPLICATIONS**

16.12. None.

16.13. **DATA PROTECTION**

16.14. None.

16.15. **FINANCIAL**

16.16. The Social Housing (Regulation) Act 2023 has focussed the Council on the following activities which have incurred the expenditure below for 2024/25:

HRA Transformation Programme Team (including on-costs)	£145,000
Property surveys (Cabinet decision 4/6/24)	£275,000
HRA business plan and asset management strategy (Pro-forma B)	£49,000
Re-engineering tenant engagement offer and TPAS membership (funded from existing budget)	£13,200
Housing manager qualifications (funded from existing budget)	£17,000
Housemark membership (benchmarking)	£5,000
Association of Retained Council Housing membership (local authority registered providers policy and practice)	£2,000
Total to date for 2024/25	£506,500

16.17. In addition to the above, the Council is subject to the following mandatory fees for 2024/25:

Regulator of Social Housing	£24k
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Housing Ombudsman	£31k
Total for 2024/25	£55k

- 16.18. It is anticipated that additional funding will be required to deliver the following during 2024/25:
- a HR policy and code of conduct (competence and conduct standard)
 - tenant engagement – establishing an offering and resources to ensure this becomes part of our housing offer (transparency, accountability and influence standard)
 - resources and potential additional contracts to deliver the outcomes of Awaab’s Law
 - ongoing collection of TSM surveys – contract being procured currently, (£7k for 2023/24)
 - housing qualifications for team leaders as part of professional development (competence and conduct standard)
 - Decent Homes 2 – anticipated to be announced by DLUHC this year requiring increased investment in homes.
- The cost of these items is currently unknown, and it is likely that additional expenditure will be required as the Programme progresses.
- 16.19. It is noted that it has been a transitional year for the HRA finances, and additional oversight and scrutiny will be required as part of adopting the HRA Business Plan.
- 16.20. **RISK MANAGEMENT**
- 16.21. None.
- 16.22. **STAKEHOLDER / CONSULTATION / TIMESCALES**
- 16.23. The Portfolio Holder - Strategic and Operational Housing and the Deputy Chief Executive (Corporate Development) and S151 Officer have been consulted. They continue to be regularly updated as Chair and Sponsor, of the Housing Transformation and Improvement Programme Board.
- 16.24. Regular briefings are being held with Housing Landlord Service Managers, the wider Housing Service, SLT and all Members (informally) to keep them updated on the progress of the Housing Transformation and Improvement Programme and sector updates.
- 16.25. Quarterly updates will be provided to Cabinet on progress made towards delivering the outcomes of the Social Housing (Regulation) Act 2023, including revised consumer standards.
- 16.26. **REPUTATION**
- 16.27. As a Registered Provider, the Council will be subject to inspection by the Regulator of Social Housing at least once during 2024-2028 as per the Social Housing (Regulation) Act 2023. This inspection will determine the frequency of future inspections.
- 16.28. Programmed inspections will look at service outcomes for tenants, and the landlord’s transparency with, and accountability to tenants. The Regulator of Social Housing will set

out their views about how an individual landlord is delivering the outcomes of any relevant standard in a regulatory judgement. The judgements will set out:

- the Regulator’s view of the landlord in relation to one or more standards, in full or in part; and
- the reasons the Regulator has reached their decisions.

16.29. As part of this judgement, landlords will be issued a grading, scored C1, C2, C3 or C4. C1 is the strongest grading, “overall the landlord is delivering the outcomes of the consumer standards. The landlord has demonstrated that it identifies when issues occur and puts plans in place to remedy and minimise recurrence”. C4 is the weakest grading, “there are very serious failings in the landlord delivering the outcomes of the consumer standards. The landlord must make fundamental changes so that improved outcomes are delivered.”

16.30. The increased public focus on social housing issues could increase the risk of reputational damage to the Council if findings of non-compliance were published by the regulator.

16.31. **CONTRACTS**

16.32. None.

16.33. **CRIME AND DISORDER**

16.34. None

16.35. **EQUALITY AND DIVERSITY/ HUMAN RIGHTS/ SAFEGUARDING**

16.36. None.

16.37. **HEALTH AND WELL BEING**

16.38. None.

16.39. **CLIMATE CHANGE AND ENVIRONMENTAL IMPLICATIONS**

16.40. None.

16.41. **LINKS TO 12 MISSIONS IN THE LEVELLING UP WHITE PAPER**

16.42. This paper contributes to the following Missions outlined in the Government’s Levelling Up White paper:

- Housing - review our voids and repairs standard with tenants.
- Digital Connectivity – working to increase digital uptake by providing training for those who want it and offering more services digitally such as Housing Repairs.
- Skills – we will equip our colleagues with the information, professionalism, skills and capacity to embed change.
- Crime – we will review our approach to managing Anti-Social Behaviour, Domestic Abuse and Hate Crime.

- Pride in Place – we will increase estate and property inspections
- Wellbeing – we will continue to offer tenants in-house tenancy support and enhance partnership working.

17. ACRONYMS

- 17.1 SELCP – South and East Lincolnshire Councils Partnership
- 17.2 DLUHC – Department of Levelling Up Homes and Communities
- 17.3 KPI – Key Performance Indicator
- 17.4 PSPSL – Public Sector Partnership Services Limited
- 17.5 HRA – Housing Revenue Account
- 17.6 TPAS – Tenant Participation Advisory Services
- 17.7 PDR – Personal Development Review (annual appraisal)
- 17.8 ARCH – Association of Retained Council Housing.

APPENDICES

None

BACKGROUND PAPERS

Background papers used in the production of this report are listed below: -

Document title	Where the document can be viewed
LGA Social Housing Management Peer Challenge 2022	https://www.sholland.gov.uk/article/22624/LGA-Peer-Challenge
LGA Corporate Peer Challenge 2023	https://www.sholland.gov.uk/council
Tenant Census Report	https://www.sholland.gov.uk/Housing-consultations-and-policies
Tenant Satisfaction Measures	www.gov.uk/government/publications/tenant-satisfaction-measures-standard/tenant-satisfaction-measures-technical-requirements-accessible-version#introduction

SHDC Tenant Satisfaction Measures	www.sholland.gov.uk/article/26344/About-us#:~:text=With%20over%203%2C700%20properties%2C%20South,on%20our%20Housing%20Policies%20page
SHDC Annual Report	www.sholland.gov.uk/article/26344/About-us#:~:text=With%20over%203%2C700%20properties%2C%20South,on%20our%20Housing%20Policies%20page
Regulator of Social Housing - Consumer Standards	www.gov.uk/government/consultations/consultation-on-the-consumer-standards
The Charter for Social Housing White Paper	www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper
The Better Social Housing Review	www.bettersocialhousingreview.org.uk/
SHDC Landlord Strategy 2024-2026	https://www.sholland.gov.uk/media/24482/SHDC-Housing-Landlord-Strategy-2024-2026/pdf/SHDC_Housing_Landlord_Strategy_2024-2026.pdf?m=1707905746373
Housing Ombudsman Complaint Handling Code	https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/
SHDC Complaint Handling Self Assessment 2024	https://www.sholland.gov.uk/Housing-Feedback
Competence and Conduct Standard (DLUHC)	https://www.gov.uk/government/consultations/competence-and-conduct-standard-for-social-housing-consultation/consultation-on-a-direction-to-the-regulator-of-social-housing-to-set-a-competence-and-conduct-standard-for-social-housing#scope-of-the-consultation
Awaab's Law: Consultation on timescales for repairs in the social rented sector (DLUHC)	www.gov.uk/government/consultations/awaabs-law-consultation-on-timescales-for-repairs-in-the-social-rented-sector#:~:text=Awaab's%20Law%2C%20which%20was%20introduced,views%20from%20across%20the%20sector.
Reforms to Social Housing Allocations (DLUHC)	www.gov.uk/government/consultations/consultation-on-reforms-to-social-housing-allocations/consultation-on-reforms-to-social-housing-allocations
2024-25 Business Plan Consultation (Housing Ombudsman)	https://www.housing-ombudsman.org.uk/2024/03/12/housing-ombudsman-consults-on-2024-25-business-plan/#:~:text=12%20March%202024&text=The%20Housing%20Ombudsman%20has%20started,social%20housing%20residents%20and%20landlords.

Good Practice Consultation (Housing Ombudsman)	https://www.housing-ombudsman.org.uk/2024/03/26/consultation-launched-on-good-practice/#:~:text=The%20overarching%20aim%20of%20Good,the%20Ombudsman%20to%20do%20so.
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CHRONOLOGICAL HISTORY OF THIS REPORT
A report on this item has not been previously considered by a Council body.

REPORT APPROVAL	
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