

Social Housing Regulation

**Overview and Scrutiny
Committee
10th November 2022**

Council Housing

Enfield Council currently own over 10,000 homes for Social and London Affordable Rent – also circa 5,000 leaseholders

Housing and Growth Strategy recognises the importance of Council Housing

Strategic alignment to Council priorities – for example:

- Invest in new Council Homes and regenerate existing estates to rebalance age/condition of stock and meet family housing needs
- Allocations Policy – prioritises those with enduring needs and supports prevention in the need for adults services support and careleavers
- Environment - standards of grounds maintenance, flytipping response and recycling enhanced
- Community safety investment

Regulator of Social Housing

“The Social Housing (Regulation) Bill aims to facilitate a new, proactive approach to regulating social housing landlords on consumer issues such as safety, transparency and tenant engagement, with new enforcement powers to tackle failing landlords. It aims to drive significant change in landlord behaviour to focus on the needs of their tenants and ensure landlords are held to account for their performance.”

Aim of the bill:

- Ensure that homes are safe
- Ensure swift and effective resolution of complaints
- Transform social housing regulation
- Increase transparency
- Empower residents
- Encourage investment in neighbourhood, place and decency

Regulator of Social Housing

Following the RSH consultation on the Introduction of Tenant Satisfaction Measures (TSMs), a Decision Statement released on the **21st September 2022** confirmed the final details for the Tenant Satisfaction Measures (TSMs) that will be used to support the RSH to monitor landlord performance

TSM Themes:

- Keeping properties in good repair
- Maintaining building safety
- Effective handling of complaints
- Respectful and helpful engagement
- Responsible neighbourhood management

Keeping properties in a good state of repair

3 TSM relate to repairs completed within time and satisfaction with repairs

Where we are:

- Currently reporting 97.98% of Council Housing repairs are completed within target timescales.
- Transactional surveys show over 80% are satisfied with the overall repairs service. Annual Survey reporting 66% satisfaction in 20-21.

How we are preparing:

- Improving the accessibility of the service through developing online options
- Steps being taken to increase the number of transactional surveys responded to each month
- CX Go-Live will support reporting of ERD and Term contractors from the same system
- Close monitoring of the performance of sub contractors and any long standing repairs

Keeping properties in a good state of repair

TSM on the proportion of homes that do not meet the Decent Homes Standard

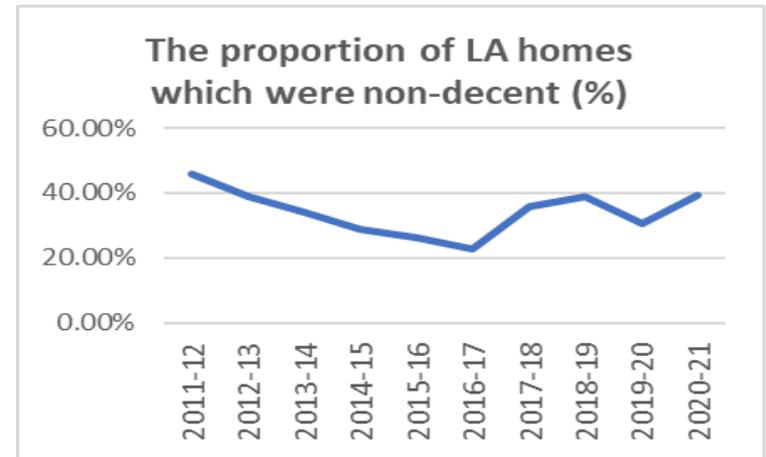
Where we are:

In response to the Decent Homes Standard – in 2008 Enfield Homes ALMO was established **with the second highest non-decent stock in the UK** – obtained £58m - £10m less than bid for

Currently non Decent Homes are at circa 40% which is high. London average for 20-21 was 11.6%

How we are preparing:

- Alignment of the Investment Programme to prioritise decency and building safety but this will be challenging with the implications of the rent cap and inflationary cost pressures - a review of available capital resources will be part of the HRA Business plan review coming to Cabinet in December
- External data specialist reviewed internal processes and systems and embedded monthly reporting with improved flow of information to see change in decency position following major works programmes and other investment works



Maintaining Building Safety

TSMs include 5 Building Safety Measures covering key safety areas Gas, Fire, Asbestos, Water and Lift Safety. Provisional measures in place with reviews and data quality checks being undertaken to ensure robust data is being reported ahead of Regulation.

Other Steps being taken

- Ensuring a Building Safety Team is in place and identified lead for TSMs
- Work in progress to move resources delivering this work outside of Council Housing into the service to allow for improved oversight of process and data
- Data Governance Board embedded to improve and sustain Data Quality
- Performance on regulatory and best practise building safety measures monitoring undertaken monthly with actions set for areas that require improvement
- Work underway to assess the options to move all compliance data to a single system
- Building Safety Action plan and Building Safety Board meeting monthly

Effective Handling of complaints

TSM on the number of complaints relevant to the size of the landlord.

Where we are:

Borough	Total stock	Stage 1 Complaints	Number of complaints relative to the size of the landlord
		2021/22	2021/22
Hillingdon	10,085	201	19.9
Enfield	10,080	373	37.0
Brent	12,234	589	48.1
Redbridge	6,958	375	53.9
Westminster	20,835	1316	63.2
Tower Hamlets Homes	22,000	1877	85.3
Homes for Haringey	19,810	2004	101.2
Kensington & Chelsea	6,904	708	102.5
Barnet Homes	12,832	1317	102.6

NB. Data sourced from London Council's Complaints benchmarking with the proposed TSM formula for TSM CH01 applied by Enfield to assess the current performance (highlighted).

Effective Handling of complaints

TSM relating to complaint responses times and satisfaction with the landlords approach to complaint handling.

Where we are:

- Enfield Council Housing Service currently responds to **85%** of complaints within time.
- 2021 satisfaction survey did not cover complaints but STAR survey for December will include this.

Other Steps being taken

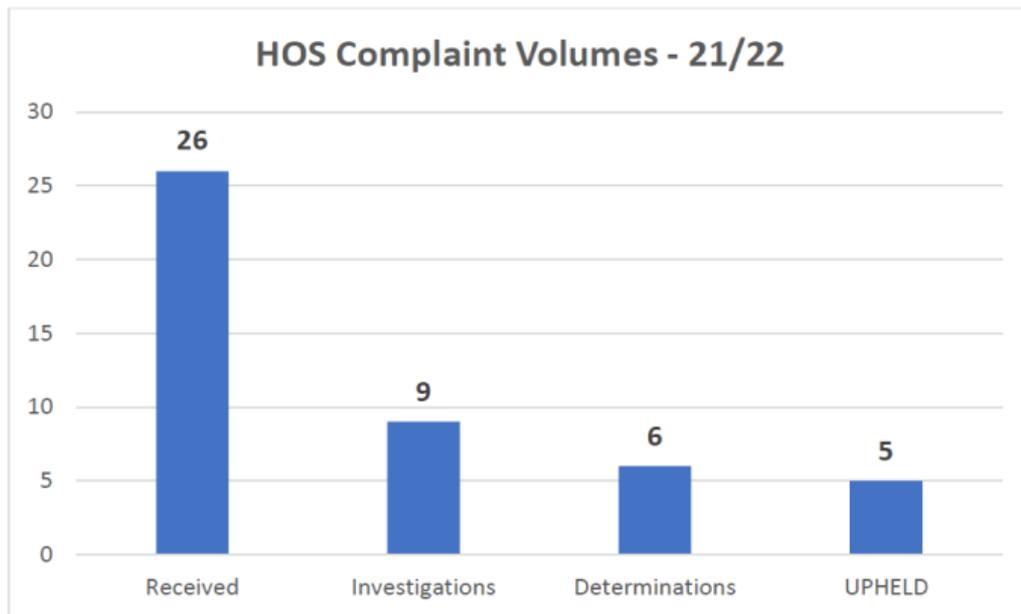
- Close monitoring of complaints response times, quality and lessons learnt
- Publicising Enfield's Complaint Policy and the Ombudsman service within Housing News
- Working with Verint Project Team and Place Complaints Team to ensure system and process are working
- Working with Ombudsman Lead at Enfield to promptly respond to all cases submitted through the HO and ensuring actions are taken where areas of improvement are identified

Effective Handling of complaints

The RSH will work with the Housing Ombudsman Service to improve performance and reduce its decision times.

In November the Housing Ombudsman will be publishing an annual landlords report including landlords that have been investigated more than 3 cases which will include Enfield and a number of other boroughs such as Hammersmith and Fulham, Camden and Lambeth

Where we are:



Enfield has completed the Annual Self Assessment against the Ombudsman Code of Conduct and have reported that we comply with all aspects. This will be published online in line with the guidance.

Respectful and helpful engagement

- Resident Involvement Strategy updated
- Tenant and Leasehold conferences held
- Star Survey planned to assess satisfaction against the final TSMs (November 2022)
- Expanding role of Customer Voice to meet regulatory requirements and working with TPAS (Tenant Engagement Experts)
- Using feedback from last survey and information from complaints and MEQs to set an action plan to make improvements
- Housing and Regeneration have also developed an 18 month rolling communication planner, covering all key milestones and achievements, consultation and engagement activity along with any national campaigns.
- EDI learning on monthly CH Briefing as well as Ombudsman learning tools on handling difficult conversations etc regularly shared with frontline staff

Responsible neighbourhood management

TSM include a number of satisfaction on this theme including ASB

Where we are:

General Needs Satisfaction Levels	% satisfied	% dissatisfied
Handling of Anti- Social Behaviour	28%	55%
Neighbourhood as a place to live	67%	19%

How we are preparing:

- Standards of grounds maintenance enhanced
- Greater focus on management of communal areas with caretakers to undertake minor repairs and improvements
- Ongoing work with Community Safety as satisfaction with ASB services is low - monitoring of ASB case performance and case file audits being undertake
- Estate/block inspections carried out on a regular basis to assess the building against the standards and actions are agreed to address issues
- Survey planned for November to include perception questions on the neighbourhood and ASB

Regulatory Notices

- The current regulatory environment is based on landlord self-reporting.
- Barking and Dagenham, Croydon, Ealing, Greenwich, Lambeth and Redbridge have self-reported for breaches and received notices and improvement requirements as a result.
- Self-referral from Greenwich where RSH confirmed that the council failed to carry out health and safety assessments across thousands of its homes
- LB Ealing Self referred due to recent 2 recent audits offered no and limited assurance
- LB Redbridge referred due to a lack of electrical checks and the regulatory subsequently found a wider range of failures in fire, asbestos and water safety
- Internal Audit undertook an assessment of Housing Compliance – Safety Checks and Lift maintenance in 2022 which concluded with satisfactory assurance
- The Regulators consumer role is currently limited by what is called the serious detriment test, however, the Government is seeking to remove this which will enable the regulator to use its monitoring and enforcement powers to resolve failures by providers to meet the consumer standards

Challenges and Risks

- The GLA as funder for affordable housing is starting to take an interest in breaches, although there is no formal link to regulatory compliance and funding.
- There is current uncertainty around the rent setting formula applied to local authorities, consultation is ongoing however any rent cap will impact our ability to deliver in areas where investment is required
- Pressure from the impact on residents due to the current cost of living crisis may divert resource away from preparation priorities.
- We need to align resources of the HRA business plan to priorities for the new environment, ensure the "who benefits test" is applied.

Assurance

- Assurance Framework in place that provides evidence where standards are met and actions where improvements are needed. The framework and action plan recommended by PWC set out lines of defence to ensure we are monitoring compliance with the standards and the reporting levels appropriate for assurance KPIs
- TSMs and other assurance measures to be reported to EMT, Cabinet and Assurance Board ahead of the regulatory collection starting in April 2023
- The London Housing Directors' Group, supported by London Councils, have developed a self assessment on the Five Pillars of an effective landlord service. These are:
 - Vision and strategy,
 - Leadership,
 - Management,
 - Performance & compliance, and
 - Assurance
- Boards in place to support management of key areas of regulation including Building Safety and Repairs

Key dates

Q2 22-23

Enfield reports draft Management Information measures to EMT, Cabinet and Assurance Board while Data Quality assessments are undertaken

Q3 22-23

Enfield reports finalised measures including annual survey measures to EMT, Cabinet and Assurance Board

April 23

Regulator requirement to collect TSMs starts

Spring 23

Regulation bill expected to pass through parliament

November 23

Perception Survey

March 24

End of first TSM reporting year

June 24

First submission of TSMs to Regulator

Autumn 24

First publication of TSMs